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<p>1 A. Correct.</p> <p>2 Q. So I want to know what Dr. Wu did</p> <p>3 that created a hostile work environment for</p> <p>4 you?</p> <p>5 A. He would, he would degrade, yell at</p> <p>6 me, I mean literally yell at me in public</p> <p>7 settings - front office, elevator, hallway -</p> <p>8 in front of external constituents, staff,</p> <p>9 other faculty.</p> <p>10 Q. Would it be accurate to say that</p> <p>11 Dr. Wu was a yellor?</p> <p>12 A. Yes.</p> <p>13 Q. And so he yelled at a lot of people,</p> <p>14 right?</p> <p>15 A. Not -- no.</p> <p>16 Q. Did you ever see him yell at</p> <p>17 students?</p> <p>18 A. His graduate students I did, yes.</p> <p>19 Q. Did you ever see him yell at any</p> <p>20 other employees?</p> <p>21 A. No, I did not.</p> <p>22 Q. What else did Dr. Wu do that made you</p> <p>23 feel that you were subjected to a hostile</p> <p>24 work environment?</p>	<p>1 A. Yes.</p> <p>2 Q. Who do you believe retaliated against</p> <p>3 you?</p> <p>4 MR. MUNSHI: Rachel, you said</p> <p>5 you had one more question.</p> <p>6 MS. FENDELL-SATINSKY: Well,</p> <p>7 she answered her question, Rahul.</p> <p>8 I'm entitled to follow up.</p> <p>9 MR. MUNSHI: I know, but you</p> <p>10 also said earlier if we want to take</p> <p>11 a break we can take a break.</p> <p>12 MS. FENDELL-SATINSKY: And</p> <p>13 your witness said she's fine to keep</p> <p>14 going.</p> <p>15 MR. MUNSHI: All right.</p> <p>16 BY MS. FENDELL-SATINSKY:</p> <p>17 Q. Ms. Briggs, are you --</p> <p>18 MR. MUNSHI: We're asking big</p> <p>19 questions here.</p> <p>20 BY MS. FENDELL-SATINSKY:</p> <p>21 Q. -- to keep going? And if you're not,</p> <p>22 I want you to tell me that, okay?</p> <p>23 I asked you one question, so since</p> <p>24 that's pending I'd like you to answer that.</p>
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<p>1 A. He thought -- he said. He would</p> <p>2 often say, "Are you stupid or something?"</p> <p>3 You know, it was degrading.</p> <p>4 He would criticize my, my finances.</p> <p>5 I mean, just really weird stuff that was...</p> <p>6 Q. So I want to know everything that he</p> <p>7 did that you believe contributed to a</p> <p>8 hostile work environment for you, and I --</p> <p>9 you've given me a couple things already, so</p> <p>10 I want to know if there's anything else.</p> <p>11 A. No. Just generalized fear.</p> <p>12 Q. Why do you believe Dr. Wu yelled at</p> <p>13 you?</p> <p>14 A. I don't know.</p> <p>15 Q. Well, why do you believe Dr. Wu said</p> <p>16 you were stupid?</p> <p>17 A. I don't know.</p> <p>18 Q. Why do you believe Dr. Wu criticized</p> <p>19 your finances?</p> <p>20 A. I don't know.</p> <p>21 Q. The final claim in your Complaint is</p> <p>22 that Temple retaliated against you because</p> <p>23 of internal reports of discrimination you</p> <p>24 made, correct?</p>	<p>1 And after that --</p> <p>2 A. So after I finish this one, okay?</p> <p>3 Q. Exactly.</p> <p>4 A. Oh, okay.</p> <p>5 Q. Yup. So my question to you was: Who</p> <p>6 do you believe retaliated against you?</p> <p>7 A. Deirdre Walton; Greg Wacker; Dr. Wu.</p> <p>8 Q. Anyone else?</p> <p>9 A. No.</p> <p>10 MS. FENDELL-SATINSKY: So,</p> <p>11 we're going to take a break for</p> <p>12 lunch.</p> <p>13 THE WITNESS: Okay.</p> <p>14 MS. FENDELL-SATINSKY: We have</p> <p>15 lunch here.</p> <p>16 I will give you a reminder</p> <p>17 that your attorney is well aware of.</p> <p>18 You are entitled to speak with your</p> <p>19 attorney, and I am entitled to ask</p> <p>20 you questions about that. The</p> <p>21 communications you have with your</p> <p>22 attorney while you're under oath are</p> <p>23 not privileged.</p> <p>24 THE WITNESS: Okay.</p>

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<p>1 MS. FENDELL-SATINSKY: So I</p> <p>2 always like to tell witnesses that</p> <p>3 up front.</p> <p>4 THE WITNESS: So I remain</p> <p>5 under oath.</p> <p>6 MS. FENDELL-SATINSKY:</p> <p>7 Exactly.</p> <p>8 THE WITNESS: Okay.</p> <p>9 MS. FENDELL-SATINSKY: I</p> <p>10 always like to tell you that up</p> <p>11 front.</p> <p>12 THE WITNESS: Okay.</p> <p>13 MS. FENDELL-SATINSKY: Because</p> <p>14 when we get back from the break, my</p> <p>15 first question for you is going to</p> <p>16 be, uh, what, if anything, you</p> <p>17 discussed with your attorney during</p> <p>18 lunch.</p> <p>19 THE WITNESS: Okay.</p> <p>20 MS. FENDELL-SATINSKY: So I</p> <p>21 think we'll take about 20 minutes,</p> <p>22 to come back at 1:35 or so. If you</p> <p>23 need more time --</p> <p>24 THE WITNESS: So it's 1:10</p>	<p>1 break, and I'll continue with my questions.</p> <p>2 Again, if you don't understand any of my</p> <p>3 questions, please let me know. And the same</p> <p>4 ground rules we went over this morning</p> <p>5 apply. Okay?</p> <p>6 A. Thank you.</p> <p>7 Q. Before we took a break, you mentioned</p> <p>8 that Dr. Wu yelled at you in public</p> <p>9 settings?</p> <p>10 A. Uh-huh.</p> <p>11 Q. Yes?</p> <p>12 A. Yes. I'm sorry. Yes.</p> <p>13 Q. How -- when did he begin, first begin</p> <p>14 yelling at you in public settings?</p> <p>15 A. When? Was it when or how?</p> <p>16 Q. When.</p> <p>17 A. When. Initially. Within a month of</p> <p>18 my being there.</p> <p>19 Q. So around October of 2009?</p> <p>20 A. Yeah.</p> <p>21 Q. How often did he yell at you in</p> <p>22 public settings?</p> <p>23 A. A couple times a month.</p> <p>24 Q. What was the process for notifying</p>
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<p>1 then, okay.</p> <p>2 MS. FENDELL-SATINSKY: It's</p> <p>3 1:15 now.</p> <p>4 THE WITNESS: 1:15, okay.</p> <p>5 MS. FENDELL-SATINSKY: So</p> <p>6 we'll take a break until about 1:35.</p> <p>7 And if you need more time than that,</p> <p>8 you can just let us know.</p> <p>9 MR. MUNSHI: Sounds good.</p> <p>10 THE WITNESS: Are you okay?</p> <p>11 MR. MUNSHI: Thank you.</p> <p>12 THE WITNESS: Okay.</p> <p>13 THE VIDEOGRAPHER: This</p> <p>14 concludes video No. 2. We're going</p> <p>15 off the record at 1:16.</p> <p>16 ---</p> <p>17 (Whereupon, a lunch recess was</p> <p>18 taken from 1:16 until 1:50 p.m.)</p> <p>19 ---</p> <p>20 THE VIDEOGRAPHER: Going back</p> <p>21 on the record. The time is 1:50.</p> <p>22 Here begins video No. 3.</p> <p>23 BY MS. FENDELL-SATINSKY:</p> <p>24 Q. Ms. Briggs, we're back from our lunch</p>	<p>1 Dr. Wu if you were going to be absent or</p> <p>2 late?</p> <p>3 A. For the department, there was no</p> <p>4 policy.</p> <p>5 Q. So were --</p> <p>6 A. Most people sent an email.</p> <p>7 Q. An email to Dr. Wu?</p> <p>8 A. Uh-huh.</p> <p>9 Q. Is that a "yes"?</p> <p>10 A. Yes. My policy was to call.</p> <p>11 Q. But you knew other people sent</p> <p>12 emails?</p> <p>13 A. Yes; because I would be cc'd.</p> <p>14 Q. And sometimes you did send emails,</p> <p>15 right?</p> <p>16 A. If I wasn't coming in?</p> <p>17 Q. Yes.</p> <p>18 A. I don't recall. I might have once or</p> <p>19 twice, but...</p> <p>20 Q. You don't recall any occasion on</p> <p>21 which you emailed Dr. Wu to tell him that</p> <p>22 you would be late or absent?</p> <p>23 A. I'm -- I don't recall. I'm not</p> <p>24 saying that I didn't, but I don't recall.</p>

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<p>1 If he wasn't -- if he was away, if he was at 2 a conference or something, that would 3 have... And I would have emailed about 4 other people, too. 5 Q. I'm going to show you an email. 6 A. Okay. 7 Q. I only have one copy of it -- 8 A. Okay. 9 Q. -- so I'm going to show your 10 attorney -- 11 A. Okay. 12 Q. -- first before I show it to you. 13 MR. MUNSHI: Do you want to 14 mark it or just -- 15 MS. FENDELL-SATINSKY: Yeah, I 16 just want to show it to you first. 17 MR. MUNSHI: Oh, okay. 18 MS. FENDELL-SATINSKY: Because 19 I only have one copy. 20 --- 21 (Whereupon, 12/18/12 email 22 regarding family emergency, Bates 23 No. TEMPLE0000392, was marked as D 24 Exhibit No. 7 for identification.)</p>	<p>1 wasn't available. 2 Q. And did Dr. Wu have a voicemail on 3 his phone? 4 A. It was always full. 5 Q. Was that part of your responsibility, 6 to check his voicemails? 7 A. No, it was not. 8 Q. Did he ever ask you to do that? 9 A. No, he did not. 10 Q. Did you ever offer to do that? 11 A. No. He really used his cell phone, 12 so... 13 Q. Did you have Dr. Wu's cell phone 14 number? 15 A. His number, yes, uh-huh. 16 Q. Do you know if his cell phone had a 17 voicemail? 18 A. I don't know. I'm assuming. 19 Q. And there were instances in which you 20 were late, correct? 21 A. Yes. 22 Q. And was Dr. Wu generally flexible 23 about that? 24 A. Until, yeah, until one time he</p>
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<p>1 --- 2 BY MS. FENDELL-SATINSKY: 3 Q. I'm going to give you a document 4 that's been marked by the -- 5 A. Okay. 6 Q. -- court reporter as D-7. 7 Does this refresh your recollection 8 that there occasions on which you emailed 9 Dr. Wu to tell him that you would be absent 10 or late? 11 A. Well, it's in writing. Yes. 12 Q. So that email refreshes your 13 recollection that you did, in fact, 14 sometimes email Dr. Wu if you were going to 15 be late or absent, correct? 16 A. Yes. 17 Q. You can put that aside. 18 A. Okay. Here, on top here 19 (indicating)? 20 Q. That's fine. 21 And in terms of notifying Dr. Wu if 22 you were going late or absent, you said 23 sometimes you called him, correct? 24 A. Yes. Or someone in the office if he</p>	<p>1 wasn't. 2 Q. And when was that one time? 3 A. The time I overslept three hours. 4 And I don't -- the date would have been 5 probably 2014. 6 Q. And what happened on the occasion on 7 which you overslept for three hours? 8 A. I woke up, had a "Home Alone" moment, 9 called work, and asked for Dr. Wu. He was 10 in a meeting. I asked for Judy. They 11 didn't know where she was, so I told the 12 student worker who was answering the phones. 13 I said, "Please tell Dr. Wu I'm" -- and I 14 live within five minutes of the University. 15 "I'm coming right now. I overslept." 16 Q. Did you call Dr. Wu's cell phone that 17 day? 18 A. No. She said he was in a meeting. 19 Q. My question was: Did you call his 20 cell phone? 21 A. No, I did not, no. 22 Q. Did you email him that day? 23 A. No, I did not. 24 Q. Did you ever text message with Dr. Wu</p>

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<p style="text-align: right;">Page 209</p> <p>1 on his personal cell phone?</p> <p>2 A. Probably, yeah.</p> <p>3 Q. Did you send him a text message on</p> <p>4 that day?</p> <p>5 A. No, I did not.</p> <p>6 Q. And do you -- how late were you when</p> <p>7 you --</p> <p>8 A. I was three hours late.</p> <p>9 MR. MUNSHI: Just wait until</p> <p>10 the question is done.</p> <p>11 THE WITNESS: Okay. I'm</p> <p>12 sorry.</p> <p>13 MR. MUNSHI: That's okay.</p> <p>14 BY MS. FENDELL-SATINSKY:</p> <p>15 Q. So you were three hours late --</p> <p>16 A. Uh-huh.</p> <p>17 Q. -- on that occasion?</p> <p>18 A. Yes, I was.</p> <p>19 Q. And -- strike that.</p> <p>20 A. I'm sorry?</p> <p>21 Q. I just said "strike that."</p> <p>22 A. Oh, okay.</p> <p>23 Q. Yup. And you didn't call in that</p> <p>24 lateness until you were three hours late,</p>	<p style="text-align: right;">Page 211</p> <p>1 A. No.</p> <p>2 Q. Was there ever a time in which you</p> <p>3 were more than 15 minutes late without</p> <p>4 notifying him?</p> <p>5 A. Not that I recall.</p> <p>6 Q. Was there ever a time that you were</p> <p>7 more than ten minutes late without notifying</p> <p>8 him?</p> <p>9 A. I think maybe I could have been.</p> <p>10 Q. Sometimes did you leave during the</p> <p>11 day to run errands?</p> <p>12 A. No.</p> <p>13 Q. You never left for errands?</p> <p>14 A. For him maybe.</p> <p>15 Q. You never left to run a personal</p> <p>16 errand yourself?</p> <p>17 A. At lunchtime.</p> <p>18 Q. Did you ever leave anytime other than</p> <p>19 lunchtime to run a personal errand for</p> <p>20 yourself?</p> <p>21 A. Can you give me -- like a doctor's</p> <p>22 appointment? I don't know what you mean.</p> <p>23 Q. So I'm asking if you recall any time</p> <p>24 that you left during the day to run an</p>
<p style="text-align: right;">Page 210</p> <p>1 correct?</p> <p>2 A. I, I woke up. Yeah, right.</p> <p>3 Q. But by the time you'd woke up, you</p> <p>4 were three hours late?</p> <p>5 A. Yes, yes.</p> <p>6 Q. But other than that particular</p> <p>7 occasion, Dr. Wu was flexible with you being</p> <p>8 late?</p> <p>9 A. Generally, in the department. I</p> <p>10 wasn't late that often.</p> <p>11 Q. Were -- was there any other time in</p> <p>12 which you were three hours late --</p> <p>13 A. Never.</p> <p>14 Q. -- without notifying?</p> <p>15 Was there any other time when you</p> <p>16 were more than two hours late without</p> <p>17 notifying him?</p> <p>18 A. No.</p> <p>19 Q. Was there any other time in which you</p> <p>20 were an hour late notifying him?</p> <p>21 A. No.</p> <p>22 Q. Was there any time in which you were</p> <p>23 more than 30 minutes late without notifying</p> <p>24 him?</p>	<p style="text-align: right;">Page 212</p> <p>1 errand during the time you worked for</p> <p>2 Dr. Wu.</p> <p>3 A. Yes.</p> <p>4 Q. And was Dr. Wu flexible with that?</p> <p>5 A. Well, I didn't -- it was lunchtime,</p> <p>6 so I didn't tell him.</p> <p>7 Q. So you never told him when you were</p> <p>8 going to leave?</p> <p>9 MR. MUNSHI: Just objection to</p> <p>10 form.</p> <p>11 THE WITNESS: (No response.)</p> <p>12 BY MS. FENDELL-SATINSKY:</p> <p>13 Q. What time did you take lunch?</p> <p>14 A. Most of the time, I didn't, but</p> <p>15 whenever it was -- I could whenever there</p> <p>16 was coverage, because I would often have to</p> <p>17 come downstairs.</p> <p>18 Q. I'm going to show your lawyer another</p> <p>19 email I only have one copy of, but then</p> <p>20 we'll mark it as an exhibit.</p> <p>21 MR. MUNSHI: This is 8, I</p> <p>22 guess.</p> <p>23 - - -</p> <p>24 (Whereupon, 1/25/13 email</p>

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<p>1 regarding picking up a prescription, 2 Bates No. TEMPLE0000382, was marked 3 Exhibit No. 8 for identification.) 4 --- 5 THE WITNESS: Thank you. 6 BY MS. FENDELL-SATINSKY: 7 Q. So, the court reporter has given you 8 a document that's been marked as D-8. 9 Have you seen that document before? 10 A. I don't remember it, but it's mine. 11 Q. It's an email from you -- 12 A. Yes. 13 Q. -- to Dr. Wu, correct? 14 A. Yes. 15 Q. And in the email you indicate that 16 you're going to run an errand for 15 17 minutes? 18 A. I'm going to Rite Aid, yes. 19 Q. And on that occasion do you recall 20 Dr. Wu giving you any problems in wanting to 21 run an errand? 22 A. No, I do not recall. 23 Q. I don't have any other questions 24 about that document at this time.</p>	<p>1 A. That is correct. 2 Q. And if you look down at the Bates 3 number in the bottom right-hand corner of 4 this document, it says "BRIGGS 23." 5 Do you see that? 6 A. Yes, I do. 7 Q. And that means that's a document that 8 your attorney provided to us. 9 A. Okay. 10 Q. So you received a copy of this 11 document, correct? 12 A. Yes. 13 Q. And it says it's a written warning; 14 is that right? 15 A. Yes, it does. 16 Q. And it was for a violation of Rule 17 B.11, unprofessional/inappropriate conduct, 18 correct? 19 A. That is correct. 20 Q. What led to this disciplinary report? 21 A. Uhm, Dr. Wu was standing in front of 22 my desk, and it was -- actually, it was the 23 day after my birthday, and, uhm, he asked me 24 how old I turned. And I guess I was 58 or</p>
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<p>1 A. I'm sorry. I didn't hear the last 2 thing you said. 3 Q. I said I don't have any other -- 4 A. Oh, okay. 5 Q. -- questions -- 6 A. Oh, okay. 7 Q. -- about that document at this time. 8 --- 9 (Whereupon, 11/09/11 10 Disciplinary Report, Bates No. 11 BRIGGS 23, was marked as D Exhibit 12 No. 9 for identification.) 13 --- 14 BY MS. FENDELL-SATINSKY: 15 Q. Ms. Briggs, the court reporter has 16 given you an exhibit that's marked as D-9. 17 A. Uh-huh. 18 Q. Take a look at the exhibit, and my 19 first question to you is going to be whether 20 you've ever seen this before. 21 A. Yes, I have. 22 Q. And is this the disciplinary report 23 from Dr. Wu to you on November -- in 24 November 2011?</p>	<p>1 something. He said, uh, "You know, in China 2 women are put out to pasture by your age." 3 And he made a similar comment before, 4 and I just said, "Well, with all due 5 respect, we are in America right now." 6 And then the next thing I knew, I got 7 called to the dean's office and I was 8 written up for unprofessional conduct. And 9 I asked Greg if he knew what Dr. Wu had said 10 to me. He didn't know. 11 Q. If you look down at the bottom of the 12 document where it says "print name," is that 13 your signature? 14 A. That's my signature. 15 Q. And then below that there's another 16 signature. 17 Do you know whose that is? 18 A. That's Dr. Wu's. 19 Q. And was this presented to you by 20 Dr. Wack -- by Mr. Wacker and Dr. Wu? 21 A. You know, I don't recall who 22 report -- I don't recall if it was just him 23 or Greg was there. I don't know. 24 Q. What occurred at the meeting during</p>

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<p>1 which this was given to you?</p> <p>2 A. I do remember. I went to -- Greg</p> <p>3 called me to his office and gave it to me</p> <p>4 for unprofessional conduct, yeah.</p> <p>5 Q. So was Dr. Wu not present?</p> <p>6 A. No, he wasn't there, no.</p> <p>7 Q. And what did Greg tell you when he</p> <p>8 gave this to you?</p> <p>9 A. He said, "Dr. Wu just said that you</p> <p>10 had been inappropriate in public," he said,</p> <p>11 "Something that was" -- you know, I</p> <p>12 shouldn't said.</p> <p>13 And I said, "Did he tell you what I</p> <p>14 said?" And I repeated it back. I said, "He</p> <p>15 said something about my age, and I said,</p> <p>16 'Well, we're not there. We're in America</p> <p>17 now.'"</p> <p>18 Q. Did Greg tell you anything else about</p> <p>19 why you received this discipline?</p> <p>20 A. No, he did not.</p> <p>21 Q. Did you ask him anything else about</p> <p>22 why you received this discipline?</p> <p>23 A. No, I did not.</p> <p>24 Q. Did you ask Dr. Wu why you received</p>	<p>1 occasion on which he said to you that women</p> <p>2 are put out to pasture by that age?</p> <p>3 A. Well, he didn't use that term, but he</p> <p>4 did say something about women in China are</p> <p>5 required to retire earlier. He didn't use</p> <p>6 the get out -- you know, "put out to</p> <p>7 pasture" thing.</p> <p>8 Q. Retire earlier than what?</p> <p>9 A. At 55, he told me.</p> <p>10 Q. So on another occasion Dr. Wu told</p> <p>11 you women in China retire at 55?</p> <p>12 A. Yes.</p> <p>13 Q. And when was that?</p> <p>14 A. Around the same, you know, very close</p> <p>15 to the same time.</p> <p>16 Q. Where were you when he said that?</p> <p>17 A. We were in his office.</p> <p>18 Q. Was the door shut?</p> <p>19 A. I don't recall.</p> <p>20 Q. Did anyone else sit close to Dr. Wu's</p> <p>21 office?</p> <p>22 A. It was pretty open. Yeah, yeah; the</p> <p>23 student workers and Judy.</p> <p>24 Q. What was the conversation you were</p>
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<p>1 this discipline?</p> <p>2 A. No, I did not.</p> <p>3 Q. When you told Dr. Wu that, what you</p> <p>4 said was, "We're in America now" or "We're</p> <p>5 in America," what was his response?</p> <p>6 A. Nothing. I mean, it didn't seem</p> <p>7 unusual. He just walked away. I mean, it</p> <p>8 wasn't like he was upset about it or</p> <p>9 anything. He just walked away.</p> <p>10 Q. And you said he had made that comment</p> <p>11 previously?</p> <p>12 A. Yes.</p> <p>13 Q. When did he make that comment</p> <p>14 previously to you?</p> <p>15 A. With, you know, within a period of</p> <p>16 four or five months, he would make reference</p> <p>17 to -- it usually had to do with my age and</p> <p>18 my salary. I mean, I would talk to him</p> <p>19 about that. And then I don't know how it</p> <p>20 got onto that women being put out to pasture</p> <p>21 at 55. I'm like...</p> <p>22 Q. So, my question is a little</p> <p>23 different.</p> <p>24 When did he -- was there another</p>	<p>1 having with Dr. Wu in which he allegedly</p> <p>2 told you that women in China retire at 55?</p> <p>3 A. It was about my, uhm -- he was</p> <p>4 telling me that I should, I should go -- I</p> <p>5 should travel, and I said, "Well, I really</p> <p>6 don't have the money to travel."</p> <p>7 And he said, "Well, you must be a</p> <p>8 poor money manager. I know how much money</p> <p>9 you're making."</p> <p>10 I was like, "Dr. Wu, I'm a single</p> <p>11 mother. I can't go." And I said, "Plus, I</p> <p>12 have a job. I just can't drop my job and</p> <p>13 go."</p> <p>14 That was, you know -- it -- I</p> <p>15 don't -- I can't say that he said that women</p> <p>16 were -- I should retire, but the implication</p> <p>17 was "it's time for you to travel and get out</p> <p>18 of here."</p> <p>19 Q. So --</p> <p>20 A. And it was -- and then this happened</p> <p>21 a couple weeks later.</p> <p>22 Q. So he didn't actually say women in</p> <p>23 China retire --</p> <p>24 A. No, but he did question me.</p>

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<p>1 Q. No. My -- just wait until --</p> <p>2 A. I'm sorry.</p> <p>3 Q. -- I ask my --</p> <p>4 A. I'm sorry.</p> <p>5 Q. -- question.</p> <p>6 A. I'm sorry.</p> <p>7 Q. So Dr. Wu did not actually say that</p> <p>8 women in China retire at 55?</p> <p>9 A. He did, but he didn't say "put out to</p> <p>10 pasture."</p> <p>11 Q. Okay.</p> <p>12 A. Okay.</p> <p>13 Q. So, you just told me he didn't, he</p> <p>14 didn't actually say --</p> <p>15 A. He didn't say "put out to pasture."</p> <p>16 MR. MUNSHI: Just wait until</p> <p>17 the question is done.</p> <p>18 MS. FENDELL-SATINSKY: Right.</p> <p>19 THE WITNESS: Okay.</p> <p>20 BY MS. FENDELL-SATINSKY:</p> <p>21 Q. So, so --</p> <p>22 A. Sorry.</p> <p>23 Q. -- I asked you before did he ever say</p> <p>24 that women were put out to pasture by a</p>	<p>1 A. He told me -- no, he did not tell me</p> <p>2 to retire.</p> <p>3 Q. You interpreted from what he was</p> <p>4 saying you felt that he was saying that you</p> <p>5 should retire?</p> <p>6 A. Yes.</p> <p>7 Q. Was it in that conversation when he</p> <p>8 told you women in China retire at 55?</p> <p>9 A. No. That was this day (indicating).</p> <p>10 No, it wasn't.</p> <p>11 Q. Okay. So the women -- so was that</p> <p>12 the same comment as "women are put out to</p> <p>13 pasture" by that age? I'm just confused.</p> <p>14 A. Yeah, I am too now, when which</p> <p>15 happened and in what order.</p> <p>16 Q. So I'm not concerned about the order</p> <p>17 right now. I understand your testimony that</p> <p>18 on the day that you received this</p> <p>19 disciplinary report, you're saying that</p> <p>20 Dr. Wu told you that women are put out to</p> <p>21 pasture by a certain age in China.</p> <p>22 A. Right.</p> <p>23 Q. I understand that.</p> <p>24 A. Okay.</p>
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<p>1 certain age anytime other than the day on</p> <p>2 which Mr. Wacker gave you this discipline,</p> <p>3 and you told me "no."</p> <p>4 A. Not that terminology, right.</p> <p>5 Q. Right. And so I asked you -- you</p> <p>6 told me -- I asked you what else did he say</p> <p>7 sort of in that vein, and you told me that</p> <p>8 he told you that women in China retire at 55</p> <p>9 and that he said that during a conversation</p> <p>10 in which he was telling you that you should</p> <p>11 travel.</p> <p>12 A. Okay. Well, let me rephrase that.</p> <p>13 Okay?</p> <p>14 Q. Sure.</p> <p>15 A. That I am, that I -- what I took from</p> <p>16 that was that he was telling me that I</p> <p>17 needed to travel and I needed to be a better</p> <p>18 money manager and travel; there's no reason</p> <p>19 I can't. "You've been" -- I'm a single</p> <p>20 mother, "go." So I, I read into that.</p> <p>21 Q. Okay. So Dr. Wu did not actually</p> <p>22 tell you that you should retire?</p> <p>23 A. No.</p> <p>24 Q. Correct?</p>	<p>1 Q. So then I asked you if he ever said</p> <p>2 that again, and you said "no," correct?</p> <p>3 A. "Put out to pasture"?</p> <p>4 Q. Yes.</p> <p>5 A. No.</p> <p>6 Q. That was your testimony.</p> <p>7 A. No, he didn't.</p> <p>8 Q. He never said that again?</p> <p>9 A. No, he did not say that.</p> <p>10 Q. And then I asked you if he made</p> <p>11 comments that were similar, and you said</p> <p>12 that he told you that women in China retire</p> <p>13 at 55; so I want to know what conversation</p> <p>14 you had with him during which he told you</p> <p>15 that women in China retire at 55.</p> <p>16 A. With, with absolute certainty, I</p> <p>17 can't give you the date or the exact</p> <p>18 wordage, but I know that it happened before</p> <p>19 this. That's why I lost it. Well, not lost</p> <p>20 it, but I -- I'm not generally one to be</p> <p>21 confrontive, but I just said, "We're not in</p> <p>22 China."</p> <p>23 Q. In what context did that conversation</p> <p>24 occur?</p>

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<p>1 MR. MUNSHI: I'm sorry. Which</p> <p>2 one?</p> <p>3 BY MS. FENDELL-SATINSKY:</p> <p>4 Q. The comment you just gave me. You</p> <p>5 said that Dr. Wu told you women in China</p> <p>6 retire at 55, correct?</p> <p>7 A. Yes.</p> <p>8 Q. And you told me that occurred before</p> <p>9 you received this disciplinary report,</p> <p>10 right?</p> <p>11 A. Yes.</p> <p>12 Q. So I want to know the conversation in</p> <p>13 which --</p> <p>14 A. I, I -- it was in his, in his office.</p> <p>15 You know, he counselled me frequently; so I</p> <p>16 can't tell you the date, to be honest with</p> <p>17 you.</p> <p>18 Q. Okay. I'm not -- I didn't ask for</p> <p>19 the date.</p> <p>20 A. Okay.</p> <p>21 Q. So my question to you was: In what</p> <p>22 context and what conversation --</p> <p>23 A. In a conversation --</p> <p>24 Q. Let me finish my question.</p>	<p>1 Q. So you don't remember anything else</p> <p>2 about that conversation with Dr. Wu except</p> <p>3 that one comment; is that correct?</p> <p>4 A. I, I can tell you it was in a</p> <p>5 conversation and in his office.</p> <p>6 Q. Okay. Other than the fact that it</p> <p>7 was in a conversation and it was in his</p> <p>8 office, is it accurate that you don't</p> <p>9 remember anything else about the</p> <p>10 conversation in which Dr. Wu allegedly told</p> <p>11 you women in China retire at 55?</p> <p>12 A. I don't know if it was added</p> <p>13 conversation, you're right. I don't know.</p> <p>14 Q. I think my question was a little bit</p> <p>15 different.</p> <p>16 MS. FENDELL-SATINSKY: Can you</p> <p>17 read my question back, please.</p> <p>18 THE WITNESS: Did he ever</p> <p>19 before that?</p> <p>20 MS. FENDELL-SATINSKY: No.</p> <p>21 THE WITNESS: Yes.</p> <p>22 MS. FENDELL-SATINSKY: That</p> <p>23 was not my question.</p> <p>24 Can you read my question back.</p>
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<p>1 A. I'm sorry.</p> <p>2 Q. My question for you was: In what</p> <p>3 context, what conversation did Dr. Wu</p> <p>4 allegedly make the comment that women in</p> <p>5 China retire at 55?</p> <p>6 A. It was in a conversation in his</p> <p>7 office. I don't know if the door was open</p> <p>8 or closed, and it was about -- it was that</p> <p>9 same travel thing, and, you know, I can't</p> <p>10 say that he -- I'm, I'm confused.</p> <p>11 Q. So are you unsure if --</p> <p>12 A. I am unsure.</p> <p>13 Q. -- Dr. Wu made the comment "women in</p> <p>14 China retire at 55"?</p> <p>15 A. Well, he did make it, but I'm unsure</p> <p>16 about the context.</p> <p>17 Q. So you don't know the context in</p> <p>18 which Dr. Wu allegedly said, "Women in China</p> <p>19 retire at 55"?</p> <p>20 A. Yes, I don't recall, right.</p> <p>21 Q. Is it your testimony you don't</p> <p>22 remember anything about that conversation?</p> <p>23 A. No, I do remember him talking about</p> <p>24 it. I don't remember the context.</p>	<p>1 ---</p> <p>2 (Whereupon, the court reporter</p> <p>3 read back the following question:</p> <p>4 Q Other than the fact that it</p> <p>5 was in a conversation and it was in</p> <p>6 his office, is it accurate that you</p> <p>7 don't remember anything else about</p> <p>8 the conversation in which Dr. Wu</p> <p>9 allegedly told you women in China</p> <p>10 retire at 55?)</p> <p>11 ---</p> <p>12 THE WITNESS: I do believe it</p> <p>13 was about the -- it was the -- and</p> <p>14 there's an email about it, about the</p> <p>15 travel and my, my, my being a poor</p> <p>16 money manager and...</p> <p>17 MS. FENDELL-SATINSKY: Again,</p> <p>18 that's not my question.</p> <p>19 THE WITNESS: That was the</p> <p>20 conversation.</p> <p>21 MR. MUNSHI: You asked what</p> <p>22 the context was. She said it three</p> <p>23 times now.</p> <p>24 MS. FENDELL-SATINSKY: Rahul,</p>

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<p>1 she hasn't answered my question. 2 That's not my question. 3 BY MS. FENDELL-SATINSKY: 4 Q. So, Ms. Briggs, the comment that 5 Dr. Wu allegedly made that women in China 6 retire at 55, was that in an oral 7 conversation? 8 A. Oh, yeah. 9 Q. Okay. And you told me that that 10 conversation was in Dr. Wu's office, 11 correct? 12 A. Yes. 13 Q. And you've told me, but correct me if 14 I'm wrong, but you don't remember what the 15 conversation was about other than that he 16 made that comment; is that right? 17 MR. MUNSHI: Objection to 18 form. That's not what she said. 19 BY MS. FENDELL-SATINSKY: 20 Q. And I told you -- 21 MR. MUNSHI: You can answer it 22 again. 23 BY MS. FENDELL-SATINSKY: 24 Q. I told you "correct me if I'm wrong,"</p>	<p>1 A. Okay. Do you need the date or 2 just -- 3 Q. Nope. 4 A. Okay. 5 Q. My question wasn't about the date. 6 A. All right. I -- it was about my, my 7 money situation. I don't even know why it 8 came up. That seemed kind of personal. And 9 he said I should travel, take some time and 10 travel. 11 Q. And then when did he make the comment 12 about women in China retiring at 55? 13 A. Well, you know -- at what time did he 14 say it? I don't -- I -- you know, in -- I'm 15 not real clear about whether it was that -- 16 I don't think it's how the conversation 17 started. I think the conversation started 18 about travel, uhm, and, you know, I said I 19 have obligations, I have to raise -- I have 20 kids to raise and I -- and he said, "Well, 21 you know, at 50" -- and I think that's when 22 he said at 50 -- women retire at 55. And I 23 don't even know if it's true, but at 55 in 24 China.</p>
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<p>1 right? 2 A. Oh, okay. 3 Q. So I want to know -- 4 A. Okay. 5 Q. -- if I'm wrong, tell me I'm wrong. 6 Okay? 7 So my question to you is that: You 8 don't -- from what you've told me, I want to 9 make sure I understand. 10 A. Okay. 11 Q. So what I understand is that you 12 don't remember anything about the 13 conversation in which Dr. Wu told you women 14 in China retire at 55 except that comment. 15 If I'm wrong, I want you to tell me I'm 16 wrong and explain that. 17 MR. MUNSHI: Objection to 18 form. 19 Answer it again. 20 THE WITNESS: Okay. 21 BY MS. FENDELL-SATINSKY: 22 Q. Do you understand my question? 23 A. I do. 24 Q. Okay.</p>	<p>1 Now, I didn't even -- I thought he 2 was just counseling me about, you know, how 3 to get myself together and so I can travel. 4 Q. Did he say that you should retire? 5 A. No, he didn't, no. 6 Q. At any point in time, did Dr. Wu tell 7 you that you should retire? 8 A. No. He never told me I should 9 retire, no. 10 Q. When Dr. Wu told you that women in 11 China retire at 55, what did you say in 12 response? 13 A. That time? 14 Q. Yes. 15 A. Uh-uh, it was a -- no. I mean, it 16 was just a conversation. I didn't make much 17 of it, to be honest with you. I just took 18 it as part of that whole conversation. 19 Q. Were you offended by it? 20 A. No; I was not at the time. I was a 21 little offended about the personal finances, 22 because I felt -- 23 Q. Because you felt? 24 A. -- my own shame. My own shame.</p>

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<p>1 Q. When Dr. Wu told you that in China 2 women are put out to pasture by a certain 3 age on the day you received this 4 disciplinary report, were you offended by 5 that comment? 6 A. Yes, I was. 7 Q. And is that why, uhm, is that why you 8 gave him the response that you did? 9 A. Yes. 10 Q. Other than what you've told me, did 11 Dr. Wu make any similar comments to you 12 during your employment at Temple about women 13 retiring or women being put out to pasture 14 at a certain age? 15 A. No. 16 Q. No? 17 A. Huh? 18 Q. I just couldn't hear you. Was your 19 answer "no"? 20 A. I'm sorry. 21 MR. MUNSHI: She said "no." 22 THE WITNESS: "No." 23 BY MS. FENDELL-SATINSKY: 24 Q. So after you told Dr. Wu that you</p>	<p>1 that comment. 2 Q. Did Dr. Wu make any other comments 3 about you being a woman after this 4 disciplinary report? 5 MR. MUNSHI: Just objection to 6 form. 7 You can answer it if you 8 understood. 9 THE WITNESS: What did you 10 say? 11 MR. MUNSHI: Objection to 12 form. 13 THE WITNESS: Uh-huh. 14 MR. MUNSHI: If you understood 15 the question, you can go ahead and 16 answer it. 17 BY MS. FENDELL-SATINSKY: 18 Q. So, that goes for everything. 19 A. Yeah. 20 Q. If you don't understand my questions, 21 remember -- 22 A. I'm not sure I understand what your 23 question was. 24 Q. Sure. So if you don't understand my</p>
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<p>1 found his comment offensive, he stopped 2 making that comment; is that accurate? 3 A. No, I didn't say... 4 Q. Okay. So tell me what you told 5 Dr. Wu in response to his comment that in 6 China women are put out to pasture by a 7 certain age. 8 A. I said, "Well, we're not in China 9 right now. We're in America." 10 And it was the day after my birthday, 11 so I -- that was a kind of weird "happy 12 birthday" kind of thing, but... 13 Q. And you said that he had no response 14 to that and walked away? 15 A. Yes. 16 Q. Correct? 17 A. Yes. 18 Q. And after you responded to him in 19 that way, he never made a similar comment 20 after that, correct? 21 A. No. 22 Q. Correct, he never made a similar 23 comment? 24 A. Correct, he never said that or made</p>	<p>1 questions -- 2 A. Okay. 3 Q. -- I want you -- 4 A. Okay. 5 Q. -- to tell me that. 6 A. Okay. 7 Q. Okay? 8 A. All right. 9 Q. So my question was: After this 10 disciplinary report that's at D-9 -- 11 A. Right. 12 Q. -- did Dr. Wu make any other comments 13 to you about you being a woman? 14 MR. MUNSHI: Just objection to 15 form. 16 Go ahead and answer it. 17 THE WITNESS: Well, are we 18 talking about age or women? 19 MS. FENDELL-SATINSKY: That 20 wasn't my -- 21 THE WITNESS: Both. 22 MS. FENDELL-SATINSKY: That 23 was not my question. I want you -- 24 THE WITNESS: I'm not --</p>

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<p>1 MS. FENDELL-SATINSKY: -- to</p> <p>2 listen to my question. Okay?</p> <p>3 THE WITNESS: Okay.</p> <p>4 MS. FENDELL-SATINSKY: Can you</p> <p>5 please read back my question.</p> <p>6 THE WITNESS: I -- okay.</p> <p>7 ---</p> <p>8 (Whereupon, the court reporter</p> <p>9 read back the following question:</p> <p>10 Q Did Dr. Wu make any other</p> <p>11 comments to you about being a</p> <p>12 woman?)</p> <p>13 ---</p> <p>14 MS. FENDELL-SATINSKY: Yup.</p> <p>15 BY MS. FENDELL-SATINSKY:</p> <p>16 Q. So after this disciplinary report at</p> <p>17 D-9, did Dr. Wu make any other comments to</p> <p>18 you about being a woman?</p> <p>19 A. No.</p> <p>20 Q. After this disciplinary report at</p> <p>21 D-9, did Dr. Wu make any other comments to</p> <p>22 you about age?</p> <p>23 A. No.</p> <p>24 MR. MUNSHI: You can put it to</p>	<p>1 Drew DiMeo to you.</p> <p>2 Do you see that?</p> <p>3 A. I -- wait a minute. February, okay.</p> <p>4 Q. Do you see where I am?</p> <p>5 A. Yes, I am.</p> <p>6 Q. And this is an email from Drew DiMeo</p> <p>7 to you in which he asks you to make a</p> <p>8 conscious effort to review certain</p> <p>9 expenditures on a monthly basis.</p> <p>10 A. That's correct.</p> <p>11 Q. And as you told me earlier,</p> <p>12 reconciling money and reports, expense</p> <p>13 reports, was part of your job, right?</p> <p>14 A. Uh-huh.</p> <p>15 Q. Is that a "yes"?</p> <p>16 A. It became my job, yes, after</p> <p>17 Alexandra left.</p> <p>18 Q. So you understood that to be part of</p> <p>19 your job responsibilities?</p> <p>20 A. Yes.</p> <p>21 Q. And in this email Drew suggests to</p> <p>22 you that you put a recurring reminder in</p> <p>23 your calendar.</p> <p>24 Do you see?</p>
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<p>1 the side.</p> <p>2 THE WITNESS: Okay.</p> <p>3 ---</p> <p>4 (Whereupon, 6/18/12 cmail</p> <p>5 string, Bates No. TEMPLE UNIVERSITY</p> <p>6 (R.BRIGGS)-0000318-319 and 399 --</p> <p>7 401, was marked as D Exhibit No. 10</p> <p>8 for identification.)</p> <p>9 ---</p> <p>10 BY MS. FENDELL-SATINSKY:</p> <p>11 Q. Ms. Briggs, the court reporter has</p> <p>12 given you a document that's been marked as</p> <p>13 D-10. It's actually two separate emails,</p> <p>14 but you'll see they go together. And so</p> <p>15 take a look at the emails, and let me know</p> <p>16 if you've seen this before, these e-mails</p> <p>17 before.</p> <p>18 A. (Brief pause while reading.)</p> <p>19 Okay, I read it.</p> <p>20 Q. Okay. So, I'm going to start with</p> <p>21 the top one on the first page.</p> <p>22 A. Uh-huh.</p> <p>23 Q. And I want you to look at the email</p> <p>24 that's from February 13th, 2012 from</p>	<p>1 A. In the -- yeah, yes.</p> <p>2 Q. And did you do that?</p> <p>3 A. Yes, I did.</p> <p>4 Q. So did you find that suggestion from</p> <p>5 him helpful?</p> <p>6 A. Yes.</p> <p>7 Q. And then the next sentence</p> <p>8 says/refers to Dr. Wu's PCARD.</p> <p>9 Do you see that?</p> <p>10 A. The same email?</p> <p>11 Q. Same email.</p> <p>12 A. Uh-huh, okay.</p> <p>13 Q. What's a PCARD?</p> <p>14 A. Uh, it's a purchasing card. It's a</p> <p>15 Visa.</p> <p>16 Q. And Drew is asking you to speak with</p> <p>17 Tarah Morris about getting Dr. Wu's</p> <p>18 purchasing card renewed; is that correct?</p> <p>19 A. Yes.</p> <p>20 Q. And, again, this email between you</p> <p>21 and Drew is from February 13th, 2012,</p> <p>22 correct?</p> <p>23 A. Correct.</p> <p>24 Q. Okay. So if you go to the next email</p>

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<p>1 that's attached, so the next set. 2 A. The top one? No, okay. 3 Q. The next set of emails that's part of 4 this exhibit. 5 A. Okay. 6 Q. It starts Bates No. 000399. 7 A. Correct. 8 Q. Do you see that? 9 A. Yes. 10 Q. Okay. And so this is an email from 11 June 18th, 2012 from Drew DiMeo to you, 12 copying Dr. Wu, correct? 13 A. Uh-huh, correct. 14 Q. Okay. And here Drew is forwarding 15 you an email from Tarah Morris -- 16 A. Morris. 17 Q. -- and is telling you that it's 18 imperative you reconcile the PCARD on a 19 monthly basis. 20 Do you see that? 21 A. I do. 22 Q. And you understood that was 23 important, right? 24 A. Yes.</p>	<p>1 A. No, I don't remember calling and 2 telling him. 3 Q. We talked about earlier one of your 4 responsibilities was to book Dr. Wu's 5 travel. 6 A. Yes. 7 Q. Correct? 8 A. Yes. 9 Q. And we also talked about earlier the 10 importance of booking travel correctly for 11 him, right? 12 A. Yes. 13 MR. MUNSHI: You can put the 14 document to the side. 15 THE WITNESS: Okay. Is this 16 over? 17 MR. MUNSHI: Just listen to 18 the question. 19 THE WITNESS: Okay. 20 MR. MUNSHI: The questions 21 that she has. 22 BY MS. FENDELL-SATINSKY: 23 Q. I think I may have just asked this, 24 but I apologize because --</p>
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<p>1 Q. And between February and June, had 2 you reconciled Dr. Wu's PCARD on a monthly 3 basis? 4 A. I had reconciled the receipts that I 5 had gotten, yes. 6 Q. So you had completely reconciled 7 Dr. Wu's PCARD from February to June of 8 2012? 9 A. Not every month, no. 10 Q. So you had not done all of the 11 months; is that correct? 12 A. No; because I, I needed receipts. 13 Q. Did you ask Dr. Wu for the receipts? 14 A. Either Dr. Wu or whoever had used it. 15 A lot of people used the card, so... 16 Q. And did you follow up with them for 17 the receipts? 18 A. I did. 19 Q. And did you tell that to Drew? 20 A. I did. I, I can't imagine that I 21 wouldn't have if he was being called for 22 something I was responsible for. 23 Q. So, I don't want you to guess. 24 Do you remember telling that to Drew?</p>	<p>1 A. Okay. 2 Q. -- Mr. Munshi's comment threw me off. 3 You told me you understood the 4 importance -- 5 A. Yes. 6 Q. -- of making correct travel 7 arrangements? 8 A. I do. 9 --- 10 (Whereupon, 8/2/12 email 11 string, Bates No. TEMPLE UNIVERSITY 12 (R.BRIGGS)-0000150-155, was marked 13 as D Exhibit No. 11 for 14 identification.) 15 --- 16 BY MS. FENDELL-SATINSKY: 17 Q. Ms. Briggs, the court reporter has 18 given you a document that's been marked as 19 D-11. I'm going to ask you to review this 20 and let me know if you've seen it before. 21 A. (Witness complies with request.) 22 Okay. 23 Q. Have you seen this document before? 24 A. Yes.</p>

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<p>1 Q. Starting on the first page of this 2 document, looking at the second email, it's 3 an email from August 1st, 2012 from Dr. Wu 4 to you. 5 A. Uh-huh. 6 Q. Do you see that? 7 A. I do. 8 Q. And in the email he asks you to check 9 a direct flight from Philly to Napa or 10 nearby, leaving Monday afternoon and coming 11 back on Thursday morning. 12 Do you see that? 13 A. Uh-huh. 14 Q. Is that a "yes"? 15 A. I see it, yes. I'm sorry. 16 Q. That's okay. 17 A. Uh-huh. 18 Q. And did you book that flight for 19 Dr. Wu? 20 A. I'm -- yes. I, I -- yes. 21 Q. Did you book the flight on an 22 incorrect date? 23 A. It says I purchased it on Monday. 24 I'm not going to argue with that, but...</p>	<p>1 MR. MUNSHI: Just listen to 2 the question. 3 BY MS. FENDELL-SATINSKY: 4 Q. You told me earlier that when you 5 started working for Dr. Wu that Dr. Wu was 6 more focused on events with speakers and 7 visiting speakers. 8 A. Yes. 9 Q. Is that correct? 10 A. He had an emphasis on it, yes, 11 absolutely. 12 Q. And was Dr. Wu involved with 13 recruiting faculty from -- recruiting 14 faculty? 15 A. Faculty internally for Temple? 16 Q. Yes. 17 A. He was part of it. Yes, he was part 18 of it. 19 Q. And did you assist him in helping 20 coordinate -- 21 A. Yes. 22 Q. -- the logistics -- 23 A. Yes. 24 Q. Let me finish my question.</p>
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<p>1 Q. So the email that's above the email 2 we just discussed is an email from Dr. Wu to 3 Justin Shi and Drew DiMeo saying that you 4 stated "clearly leaving on Monday," but you, 5 Ruth, changed it to Sunday and purchased it 6 without his knowledge. 7 Do you know what Dr. Wu is referring 8 to? 9 A. Uhm, I don't recall. 10 Q. Did you -- was there an occasion, any 11 occasion on which you incorrectly booked 12 flights for Dr. Wu? 13 A. Not to my knowledge. 14 Q. So you -- 15 A. Not without being directed, no. 16 Q. So you don't recall any occasion on 17 which you booked incorrect travel for 18 Dr. Wu? 19 A. No, I don't. 20 MR. MUNSHI: You can put that 21 to the side. Just wait for her 22 question. 23 THE WITNESS: Oh, I wanted to 24 make sure I know what it's about.</p>	<p>1 A. Uh-huh. 2 Q. Did you assist him in coordinating 3 logistics for faculty when they came to 4 interview at Temple? 5 A. Candidates, right? 6 Q. Candidates. 7 A. Yes. 8 Q. Yes. 9 So faculty from other universities or 10 schools that came to interview -- 11 A. Right. 12 Q. -- at Temple, correct? 13 A. That is correct. 14 Q. And when you had candidates come 15 visit, it was important to ensure they had 16 the best visit possible, right? 17 A. Yes. 18 Q. Because if they were a candidate it 19 was somebody that Temple potentially wanted 20 to hire, right? 21 A. That is correct. 22 Q. And were you responsible for, in some 23 occasions, in booking travel for candidates 24 when they came to visit?</p>

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<p>1 A. The tenured faculty, yes.</p> <p>2 Q. And you told me before you understood</p> <p>3 the importance of booking correct travel,</p> <p>4 right?</p> <p>5 A. Absolutely.</p> <p>6 Q. And that would hold true for</p> <p>7 candidates visiting as well?</p> <p>8 A. Yes.</p> <p>9 Q. While working under Dr. Wu, was there</p> <p>10 an instance in which you forgot to book</p> <p>11 plane reservations for a visiting candidate?</p> <p>12 A. Well, I didn't forget, but Clint</p> <p>13 Whaley, yes, his ticket was not purchased.</p> <p>14 Q. And you said you didn't forget.</p> <p>15 What do you mean?</p> <p>16 A. He and I were -- Clint Whaley and I</p> <p>17 were going back and forth. I'd get him an</p> <p>18 itinerary, and he'd say it's not working,</p> <p>19 try another one, and it just went back and</p> <p>20 forth and...</p> <p>21 Q. Let me show you an email maybe to</p> <p>22 refresh your recollection.</p> <p>23 A. I'm the one who admitted that I</p> <p>24 didn't.</p>	<p>1 A. (Brief pause while reading.)</p> <p>2 Okay.</p> <p>3 Q. So I'm going to start at the back,</p> <p>4 which is the earliest of the emails, and the</p> <p>5 first email that starts this chain of emails</p> <p>6 is on February 20th, 2013 from you to</p> <p>7 Dr. Whaley, correct?</p> <p>8 A. Yes.</p> <p>9 Q. And was Dr. Whaley a candidate that</p> <p>10 was coming in for an interview at Temple?</p> <p>11 A. Yes.</p> <p>12 Q. And you emailed Dr. Whaley on</p> <p>13 February 20th, 2013 and informed him that</p> <p>14 you had confirmed lodging for him, correct?</p> <p>15 A. Yes.</p> <p>16 Q. And about a month later, on March</p> <p>17 22nd, 2013, Mr. Whaley emailed you and asked</p> <p>18 if there was an itinerary for the visit yet</p> <p>19 and how he's going to -- is he going to take</p> <p>20 a taxi from the airport to the hotel.</p> <p>21 A. Uh-huh.</p> <p>22 Q. Do you see that?</p> <p>23 A. Uh-huh.</p> <p>24 Q. Is that a "yes"?</p>
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<p>1 ---</p> <p>2 (Whereupon, 3/24/13 email</p> <p>3 string regarding lodging for Whaley,</p> <p>4 Bates No. TEMPLE0000571-575, was</p> <p>5 marked as D Exhibit No. 12 for</p> <p>6 identification.)</p> <p>7 ---</p> <p>8 BY MS. FENDELL-SATINSKY:</p> <p>9 Q. So, I want you to take a look at this</p> <p>10 email and let me know when you're finished</p> <p>11 reviewing the whole email.</p> <p>12 A. (Witness complies with request.)</p> <p>13 MR. MUNSHI: You meant the</p> <p>14 whole thread, right?</p> <p>15 MS. FENDELL-SATINSKY: Yup,</p> <p>16 the whole string of emails.</p> <p>17 THE WITNESS: I remember very</p> <p>18 clearly.</p> <p>19 MR. MUNSHI: Read through it.</p> <p>20 THE WITNESS: I do, I remember</p> <p>21 it clearly.</p> <p>22 BY MS. FENDELL-SATINSKY:</p> <p>23 Q. Let me know when you're finished</p> <p>24 reading the document.</p>	<p>1 A. Yes. Sorry.</p> <p>2 Q. And he emailed you at 8:54 a.m.</p> <p>3 Do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. And did you respond to that email?</p> <p>6 A. Well, on that day I can't say that I</p> <p>7 did, but I did respond to his email. I sent</p> <p>8 him several itineraries.</p> <p>9 And there aren't any emails to me</p> <p>10 here, are there?</p> <p>11 Q. So I'm staying right now on that</p> <p>12 email. And you said you believe you sent</p> <p>13 him itineraries, but you don't --</p> <p>14 A. No.</p> <p>15 Q. -- know that you responded that day,</p> <p>16 that day being March 22nd; is that correct?</p> <p>17 A. That's correct.</p> <p>18 Q. And did you work on Saturdays and</p> <p>19 Sundays?</p> <p>20 A. Yes, I did.</p> <p>21 Q. Every Saturday and Sunday?</p> <p>22 A. No.</p> <p>23 Q. You'll see the next email on the</p> <p>24 earlier page, which is a March 22nd email</p>

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<p>1 from Dr. Whaley to Dr. Kwatny. 2 A. Kwatny, okay. 3 Q. Kwatny? 4 A. Uh-huh. 5 Q. Do you see that? 6 A. Yes, I do. 7 Q. And that email is from 3:47 p.m., 8 correct? 9 A. Yes. 10 Q. And in that email Dr. Whaley is 11 asking Dr. Kwatny that he assumes interview 12 is still scheduled and, if so, if there's 13 somebody who can answer his below questions 14 regarding the itinerary and taking a taxi. 15 Do you see that? 16 A. Uh-huh. 17 Q. Is that a "yes"? 18 A. Yeah. I'm sorry. Yes. 19 MR. MUNSHI: Do your best -- 20 THE WITNESS: I'm sorry. 21 MR. MUNSHI: -- to verbalize. 22 THE WITNESS: I'm sorry. 23 MR. MUNSHI: That's okay. 24 MS. FENDELL-SATINSKY: That's</p>	<p>1 BY MS. FENDELL-SATINSKY: 2 Q. Yes, it does? 3 A. (Indicating). 4 Q. And based on Dr. Whaley's email to 5 Dr. Kwatny on March 22nd, do you believe 6 that you did not respond? 7 A. Which -- tell me what email again. 8 Q. Sure. So, read the email. The 9 second from the page, there's an email. 10 A. 572? 11 Q. On 574. 12 A. Okay, all right. 13 Q. So on 574 there's two emails at the 14 bottom of the page. 15 A. Uh-huh. 16 Q. Do you see them? 17 A. Uh-huh. 18 Q. Is that a "yes"? 19 A. Yes, yes. I'm sorry. 20 Q. So one email is from Dr. Kwatny to 21 Dr. Whaley on March 22nd at 6:41 p.m. 22 A. Okay. 23 Q. And the other email is from 24 Dr. Whaley to Dr. Kwatny at 3:47 p.m.</p>
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<p>1 okay. 2 THE WITNESS: I'm just... 3 MS. FENDELL-SATINSKY: That's 4 okay. 5 BY MS. FENDELL-SATINSKY: 6 Q. And does that help refresh your 7 memory that you did not respond on March 8 22nd, if Dr. Whaley was following up with 9 Dr. Kwatny? 10 A. I don't see my emails to him. That's 11 the whole thing. 12 Q. Right. You told me you did not 13 remember responding to Dr. Whaley on March 14 22nd, correct? 15 A. I don't know that, you're right, 16 correct. 17 Q. So I was saying, by seeing this email 18 from Dr. Whaley to Dr. Kwatny later in the 19 afternoon on March 22nd, does that refresh 20 your recollection that you did not respond? 21 A. Yes. 22 MR. MUNSHI: Objection to 23 form, but go ahead. 24</p>	<p>1 Do you see those? 2 A. I see those. 3 Q. So, read those emails. And those 4 emails -- well, let me step back. 5 Those emails indicate that Dr. Whaley 6 is still looking for information regarding 7 his itinerary and travel from the airport, 8 correct? 9 A. That is correct. 10 Q. And so seeing those emails, does that 11 refresh your recollection that you did not 12 respond to Dr. Whaley about his itinerary 13 and transportation from the airport on March 14 22nd? 15 A. Yes. It responds -- my memory is I 16 remember this. But the exact question that 17 I didn't respond, I can't say that that is 18 true, because we talked on the phone on 19 numerous occasions. 20 Q. If you turn to the next page, which 21 is TEMPLE0000573, the bottom of that email 22 is an email from Dr. Whaley to Dr. Kwatny 23 and you on March 23rd. 24 A. 23rd, uh-huh.</p>

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<p>1 Q. Do you see that?</p> <p>2 A. Uh-huh.</p> <p>3 Q. And in that email Dr. Whaley says</p> <p>4 looking through his email he doesn't have an</p> <p>5 actual E-ticket. He had a proposed flight</p> <p>6 from Ruth, "but I don't have any email</p> <p>7 confirming after I approved the flight. I</p> <p>8 tried to look up the flight that Ruth sent</p> <p>9 me, and Delta does not seem to know about</p> <p>10 it."</p> <p>11 A. Uh-huh.</p> <p>12 Q. Do you see that?</p> <p>13 A. I see that.</p> <p>14 Q. And did you, in fact -- did</p> <p>15 Dr. Whaley, in fact, approve a flight?</p> <p>16 A. No, he did not, not -- we -- I left</p> <p>17 him num -- I, I, I, I -- I'll -- I can check</p> <p>18 my emails too, because I kept them, but I</p> <p>19 contacted by email, but he wasn't</p> <p>20 responding. It was about a month period</p> <p>21 that this started.</p> <p>22 So I would call him. I'd say,</p> <p>23 "Dr. Whaley, this is very confusing about</p> <p>24 when you want to leave and where the</p>	<p>1 A. Okay.</p> <p>2 Q. -- provide those to your attorney.</p> <p>3 A. I'll look. I'll look.</p> <p>4 Q. And why would you still have those</p> <p>5 emails?</p> <p>6 A. Because I had -- I feel like I had</p> <p>7 been discriminated against. Why would I not</p> <p>8 save them? There's, there's, there's no</p> <p>9 mitigating factor here.</p> <p>10 Q. That --</p> <p>11 A. You know, they --</p> <p>12 Q. Ms. Briggs.</p> <p>13 A. I cannot tell you --</p> <p>14 MR. MUNSHI: She's answering</p> <p>15 your question.</p> <p>16 MS. FENDELL-SATINSKY: No,</p> <p>17 she's not, and so I'm going to --</p> <p>18 MR. MUNSHI: She is answering.</p> <p>19 MS. FENDELL-SATINSKY: --</p> <p>20 interrupt you and --</p> <p>21 MR. MUNSHI: You asked why</p> <p>22 would she do it.</p> <p>23 MS. FENDELL-SATINSKY: --</p> <p>24 stop --</p>
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<p>1 layover" -- whoop, "the layovers are, so</p> <p>2 could we talk on the phone?"</p> <p>3 Q. So I will tell you I don't have any</p> <p>4 records of those emails.</p> <p>5 A. Well, no. I --</p> <p>6 Q. If you do you have those --</p> <p>7 A. Okay.</p> <p>8 Q. -- emails, I would ask that you</p> <p>9 search for them and you provide them --</p> <p>10 A. Okay.</p> <p>11 Q. -- to your attorney. Following this</p> <p>12 deposition, I am going to send your attorney</p> <p>13 a letter --</p> <p>14 A. Okay.</p> <p>15 Q. -- that will list other documents</p> <p>16 you've identified today that you have not</p> <p>17 produced in this litigation.</p> <p>18 MR. MUNSHI: And we'll talk</p> <p>19 about it.</p> <p>20 THE WITNESS: Okay.</p> <p>21 BY MS. FENDELL-SATINSKY:</p> <p>22 Q. And so if you do have documents that</p> <p>23 relate to Dr. Whaley's visit, I would ask</p> <p>24 that you --</p>	<p>1 MR. MUNSHI: And she's</p> <p>2 answering your question.</p> <p>3 MS. FENDELL-SATINSKY: -- you.</p> <p>4 BY MS. FENDELL-SATINSKY:</p> <p>5 Q. So do you have access still to your</p> <p>6 Temple University email account?</p> <p>7 A. I don't.</p> <p>8 MR. MUNSHI: Were you done</p> <p>9 answering the previous question?</p> <p>10 THE WITNESS: No, I'm not.</p> <p>11 MS. FENDELL-SATINSKY: I'm</p> <p>12 going to cut you off because it's</p> <p>13 not answering --</p> <p>14 THE WITNESS: Okay.</p> <p>15 MR. MUNSHI: You asked her --</p> <p>16 MS. FENDELL-SATINSKY: -- and</p> <p>17 responsive to my question.</p> <p>18 MR. MUNSHI: -- why did she do</p> <p>19 something, and she's explaining it.</p> <p>20 Just because you don't like what</p> <p>21 she's saying doesn't mean you can</p> <p>22 stop her.</p> <p>23 MS. FENDELL-SATINSKY: Ms.</p> <p>24 Briggs.</p>

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<p>1 THE WITNESS: Yes?</p> <p>2 MS. FENDELL-SATINSKY: I'm</p> <p>3 going to ask you --</p> <p>4 THE WITNESS: Okay.</p> <p>5 MS. FENDELL-SATINSKY: -- a</p> <p>6 question again.</p> <p>7 THE WITNESS: Okay.</p> <p>8 MS. FENDELL-SATINSKY: Okay?</p> <p>9 And I want you --</p> <p>10 MR. MUNSHI: And you're going</p> <p>11 to withdraw --</p> <p>12 MS. FENDELL-SATINSKY: --</p> <p>13 answer it --</p> <p>14 MR. MUNSHI: -- the previous</p> <p>15 question.</p> <p>16 MS. FENDELL-SATINSKY: -- to</p> <p>17 the best of your ability.</p> <p>18 THE WITNESS: Okay.</p> <p>19 MS. FENDELL-SATINSKY: Okay?</p> <p>20 MR. MUNSHI: So the previous</p> <p>21 question has to be withdrawn.</p> <p>22 BY MS. FENDELL-SATINSKY:</p> <p>23 Q. So, uhm, so you told me you no longer</p> <p>24 have access to your Temple University email?</p>	<p>1 your own possession?</p> <p>2 A. Because I saved them.</p> <p>3 Q. Right. But you told me you saved</p> <p>4 them to a shared network drive.</p> <p>5 A. I know, but I also saved -- printed</p> <p>6 out a copy for me.</p> <p>7 Q. Okay. Because I asked you before if</p> <p>8 you printed anything out, and you said "no."</p> <p>9 A. Oh, okay. Oh, okay. Well, I --</p> <p>10 well, when I say printed out, I would save</p> <p>11 it to as a PDF for me too. I don't -- I'm</p> <p>12 not a paper -- I printed to PDF, is what I</p> <p>13 should say.</p> <p>14 Q. And how -- I understand when you</p> <p>15 printed to PDF you saved on the shared</p> <p>16 drive; is that right?</p> <p>17 A. I shared -- but I kept a copy for me</p> <p>18 for my records.</p> <p>19 Q. And how did you do that?</p> <p>20 A. I did it on my, my computer.</p> <p>21 Q. Where did you save it to?</p> <p>22 A. We had -- my desktop or my documents.</p> <p>23 We didn't have to file everything on there.</p> <p>24 Q. I understand, but I'm asking: Since</p>
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<p>1 A. No, I do not.</p> <p>2 Q. Okay. And when you were at Temple,</p> <p>3 did you print out copies of emails?</p> <p>4 A. No.</p> <p>5 Q. How did you save emails from when you</p> <p>6 were at Temple to still have them today?</p> <p>7 A. If they were relevant and I needed a</p> <p>8 confirmation, I would just print it as a PDF</p> <p>9 and save it on our, on our shared network</p> <p>10 drive.</p> <p>11 Q. And do you still have access to the</p> <p>12 shared network drive?</p> <p>13 A. No.</p> <p>14 Q. Did that cease when your employment</p> <p>15 with Temple ended?</p> <p>16 A. Oh, I don't think so.</p> <p>17 Q. Well, I'm sorry. Did your access to</p> <p>18 the shared network drive cease when your</p> <p>19 employment --</p> <p>20 A. Yes.</p> <p>21 Q. -- with Temple ended?</p> <p>22 A. Yeah.</p> <p>23 Q. So how did you get emails from the</p> <p>24 shared network drive that you had saved into</p>	<p>1 you don't have access to your Temple</p> <p>2 computer anymore --</p> <p>3 A. No, I do not.</p> <p>4 Q. But you're telling me you still have</p> <p>5 emails from Temple, correct?</p> <p>6 A. I do.</p> <p>7 Q. So I want to know how you still have</p> <p>8 emails from Temple, and you told me that you</p> <p>9 saved things to PDF.</p> <p>10 A. Right.</p> <p>11 Q. Right? So how did you get the things</p> <p>12 that you saved from PDF to be in your</p> <p>13 possession now, given that you no longer</p> <p>14 have access to your Temple emails?</p> <p>15 A. I imported them into my personal</p> <p>16 email account the day I got fired.</p> <p>17 Q. And how did you import them into your</p> <p>18 personal email account?</p> <p>19 A. From gmail to gmail. I just</p> <p>20 imported.</p> <p>21 Q. Did you just forward them?</p> <p>22 A. No. I -- there's an import function.</p> <p>23 Q. And how does that work?</p> <p>24 A. Google Mail. I don't -- I'm not --</p>

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<p>1 Q. Well, how did you actually complete 2 the import? 3 A. I can't -- I don't -- can't -- I'd 4 have to look at the directions. 5 MS. FENDELL-SATINSKY: Mr. 6 Munshi, I'm going to ask you again 7 to stop nodding your head to the 8 witness. 9 MR. MUNSHI: Sorry. I'm just 10 rocking. 11 THE WITNESS: I didn't even 12 see him. I'm looking at you. 13 MR. MUNSHI: Nothing is 14 intended. I'm just -- 15 MS. FENDELL-SATINSKY: That's 16 fine. It was just the second time 17 I've spoken to you about it. 18 MR. MUNSHI: And I apologize. 19 And like I said, the first time it 20 was inadvertent. 21 THE WITNESS: So does that -- 22 is that -- 23 BY MS. FENDELL-SATINSKY: 24 Q. So, so you have copies of your Temple</p>	<p>1 Q. Did you ask anyone at Temple if you 2 could do that? 3 A. No, I did not. 4 Q. And have you looked through those 5 emails in conjunction with finding emails 6 relevant to your litigation? 7 A. Say that -- ask that -- 8 Q. Sure. 9 Have you looked through those emails 10 in conjunction with this lawsuit that you've 11 filed against Temple? 12 A. Have I or how do I? 13 Q. Have you. 14 A. Yes, I have. 15 Q. Okay. And you said you decided to 16 save documents based upon anything that was, 17 did you say, blaming you for something? Or 18 "accusing" you of something I think was -- 19 A. Right. 20 Q. -- the word you used. 21 A. Right. 22 Q. So you saved any email that was 23 accusing you of something? 24 A. Yes. And anything that might</p>
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<p>1 emails now in your personal gmail account? 2 A. Yes. Yes, I do. 3 Q. That are accessible to you -- 4 A. Yes, yes. 5 Q. -- currently? 6 A. Yes. 7 Q. And the emails that you imported from 8 Temple into your personal gmail account, did 9 those all relate to your employment at 10 Temple? 11 A. Yes; or my termination, I guess. 12 Q. How many emails were there that you 13 imported? 14 A. I don't know. Maybe -- any of these 15 documents, any of these emails that were 16 accusing me of something, so that. So there 17 were, like, 50. 18 Q. About approximately 50? 19 A. Approximately 50 in that, yeah. 20 Q. So you believe you imported 21 approximately 50 emails from your Temple 22 email to your personal email? 23 A. And that's a vague number. It's 24 probably less.</p>	<p>1 support, support it, you know. 2 Q. Support accusations against you? 3 A. Yeah. I mean, if there was -- like, 4 there's not an -- some things here from me 5 either, so I'm not sure what it is, but... 6 Q. I understand. And so you think if 7 there were emails from you to Dr. Whaley -- 8 A. Dr. Whaley. 9 Q. -- those would be in the emails you 10 imported from your Temple email to your 11 personal email? 12 A. Yes. 13 Q. So I'm, again, I'm going to send an 14 email to your attorney after the deposition. 15 A. Uh-huh. 16 Q. But for the record, I'm going to 17 make -- 18 A. Okay. 19 Q. -- the note that we would like you to 20 search for those emails. I have not seen 21 any of those emails between you and 22 Dr. Whaley other than what I have here as 23 D-12. 24 A. Uh-huh.</p>

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<p>1 Q. And if you have them, then you can 2 give them in to your attorney and he'll pass 3 them on to us. 4 A. Can I ask a question then? 5 Q. Uhm, I -- 6 A. About the voicemail. Because I -- it 7 was mostly voicemail, talking on the phone. 8 So how do I document that? 9 Q. So you have voicemails? 10 A. I don't know -- 11 Q. Oh, you -- 12 A. -- where they belong. I mean who has 13 them. 14 Q. Do you have voice -- did you import 15 any voicemails? 16 A. No. I don't -- no. 17 Q. Okay. 18 A. But that -- I -- so I can't access 19 that. I mean him, you know, contacting me, 20 leaving me a voicemail. 21 Q. I understand that. But you said if 22 there were emails that you would have -- 23 A. I'll check, yes. 24 Q. -- copies of the emails.</p>	<p>1 And as soon as I realized it was 2 Clint Whaley, I went right in and told 3 Dr. Wu. 4 Q. So Dr. -- is it your testimony that 5 because Dr. Wu asked you to work on another 6 project you did not follow up with 7 Dr. Whaley? 8 A. Yes. 9 Q. And I believe you testified to this 10 before, but ultimately you did take 11 responsibility for not booking Dr. Whaley's 12 travel, correct? 13 A. At the end, yes. At the end, it 14 falls on me. 15 Q. You recognized -- 16 A. I dropped the ball. 17 Q. So you recognized that -- 18 A. Yes. 19 Q. -- you did not complete something 20 that you were supposed to? 21 A. Yes, I do. 22 Q. And you understood that not booking 23 his travel was problematic; is that correct? 24 A. Oh, absolutely.</p>
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<p>1 A. I'll check, but I'm not sure if there 2 are anymore. I'll have to check. 3 Q. Okay. Did you tell Dr. Wu or anyone 4 else that Mr. Whaley was not getting back to 5 you? 6 A. I don't recall. 7 Q. I'm sorry. That Dr. Whaley was not 8 getting back to you. 9 A. Back to you, right. I don't recall, 10 and I have -- I'd like to give you a reason 11 for that. 12 Q. Sure. 13 A. Dr. Wu had -- was organizing an NSF 14 conference, and he was using student 15 workers; and like three days before the 16 conference was to happen, he pulled me off. 17 He says, "This is a priority. Drop 18 everything. Do this." 19 And I literally, like, had to pull a 20 program together, food, everything, in like 21 three days. So, I remember coming home from 22 work and sitting on my bed and saying, "A 23 ball is going to drop, and it's going to hit 24 my head." And it did.</p>	<p>1 Q. Did Dr. Whaley ultimately come visit 2 Temple? 3 A. No, he did not. 4 Q. And was that because his travel was 5 not booked? If you know. 6 A. I don't know. 7 Q. And was Dr. Whaley hired by Temple? 8 A. No. 9 Q. And to become hired by Temple, in 10 your experience, does the person have to 11 interview in-person? 12 A. This is -- yes. Several. You know, 13 there's a process. 14 Q. And to be hired as a faculty at 15 Temple, in your experience, the person must 16 interview several times in-person? 17 A. Yes. 18 Q. So because Dr. Whaley did not 19 actually visit, he could not have been hired 20 for the position? 21 A. That is correct. 22 Q. And were you disciplined for this? 23 A. Three days suspension without pay. 24 - - -</p>

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<p>1 (Whereupon, 3/26/13 2 Disciplinary Report, Bates No. 3 BRIGGS 49, was marked as D Exhibit 4 No. 13 for identification.) 5 --- 6 BY MS. FENDELL-SATINSKY: 7 Q. Ms. Briggs, my first question to you 8 is going to be whether you're seen this 9 document before. 10 A. Yes, I have. 11 Q. And is this the discipline you 12 received as a result of the incident with 13 Dr. Whaley you just testified about? 14 A. Yes, I -- yes, it is. 15 Q. And where it says "employee 16 signature," is that your signature? 17 A. That is mine. 18 Q. And where it says "Ruth Briggs" in 19 the handwritten text, is that your 20 handwriting? 21 A. Yes. 22 Q. And below that it says "Jie Wu." 23 Do you recognize -- 24 A. I do recog --</p>	<p>1 the discipline? 2 A. Yes. 3 Q. But you understood that you were 4 issued a Level C discipline? 5 A. Yes. 6 Q. And you understood -- you told me 7 before that you dropped the ball. 8 And in "dropping the ball," which 9 were your words, did you fail to carry out 10 an instruction given by Dr. Wu to book 11 travel for Dr. Whaley? 12 A. To complete it, yes. 13 Q. And if you need to pull it back out, 14 that's fine, but the first time that there's 15 a Level C infraction, that leads to a 16 suspension without pay, correct? 17 A. Right, correct. 18 Q. And you understood that, correct? 19 A. I didn't know that then, but I did 20 after, yeah. 21 Q. But you did have access to the Rules 22 of Conduct throughout your -- 23 A. I did. 24 Q. -- employment?</p>
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<p>1 Q. -- the signature as Dr. Wu's 2 signature? 3 A. Uh-huh. 4 Q. Is that a "yes"? 5 A. Yes, it is. I'm sorry. 6 Q. And this, uh, was a three-day 7 suspension without pay, correct? 8 A. Correct. 9 Q. And this was issued to you on March 10 26th, 2013, right? 11 A. Yes. 12 Q. In "explanation," it says, "C.4 - 13 Neglecting job duties or responsibilities or 14 failing to carry out instructions given by a 15 supervisor (sic)." 16 A. Correct. 17 Q. Do you see that? 18 A. Yes. 19 Q. And do you understand, uhm, that you 20 had committed a Level C disciplinary 21 infraction? 22 A. I disagree with the level, but, yes, 23 I do. I dropped the ball. 24 Q. So you disagreed with the severity of</p>	<p>1 A. Right. 2 Q. Okay. So had you wanted to 3 understand what type of discipline you might 4 be given, you could have consulted the Rules 5 of Conduct? 6 A. I'm not sure I understand your 7 question. 8 Q. Okay. I understand that you said you 9 didn't understand that a Level C infraction 10 the first time resulted in a three-day 11 suspension without pay, correct? 12 A. I understood -- 13 Q. Until you received this. 14 A. Well, I understood what a C did, but 15 I disagree with this being a Level C, is 16 what I said. 17 Q. Okay, I understand. 18 A. Okay. 19 Q. So when you received this 20 disciplinary report, you understood that it 21 was a Level C infraction and because it was 22 a Level C infraction the discipline was a 23 three-day suspension without pay? 24 A. They told me. Right.</p>

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<p>1 Q. Okay. And you said you disagreed 2 with the severity of the discipline? 3 A. Uh-huh. 4 Q. Is that a "yes"? 5 A. Yes, it is. 6 Q. Why? 7 A. Because it wasn't willful. It was a 8 mistake, and there are mitigating factors. 9 I was alone in the office. There was Judy 10 Lennon was on family medical leave because 11 her mom died. I mean, there was no one in 12 the office, and I was pulling it, so... 13 I'm not going to make excuses for 14 dropping the ball, but I -- there was a lot 15 of other things. And I -- Dr. Kwatny says 16 people in our department don't make 17 mistakes. Well, I did, and I owned up to it 18 and I took my three-day suspension. 19 Q. The, uh, the instruction to book 20 Dr. Whaley's travel, that was given solely 21 to you, correct? 22 A. I believe, yes. That's my knowledge. 23 Q. So you don't have any knowledge that 24 Ms. Lennon was involved?</p>	<p>1 Q. So -- 2 A. Do I understand or do I agree? What 3 was the... 4 Q. Sure. 5 A. I'm sorry. 6 MS. FENDELL-SATINSKY: Are you 7 able to read it back? 8 THE WITNESS: Okay. 9 THE COURT REPORTER: Uh-huh. 10 MS. FENDELL-SATINSKY: Thank 11 you. 12 --- 13 (Whereupon, the court reporter 14 read back the following: 15 Q And although you disagreed 16 with it, did you understand Dr. Wu's 17 position about why it was a Level C 18 infraction?) 19 --- 20 THE WITNESS: No, I don't. 21 BY MS. FENDELL-SATINSKY: 22 Q. So you did not understand why -- 23 A. No, I don't understand why it was a 24 Level C.</p>
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<p>1 A. No, I don't have any. 2 Q. Or that she was asked to be involved? 3 A. I don't have any knowledge if she 4 was. 5 Q. And you did not ask Ms. Lennon to be 6 involved, correct? 7 A. No, I didn't, no. 8 Q. No, you did not ask her -- 9 A. I did not -- 10 Q. -- to be involved? 11 A. -- ask her, no. 12 Q. Why did you feel -- let me step back. 13 I understand from what you've told me 14 that you disagreed with the severity of the 15 discipline, correct? 16 A. Correct. 17 Q. Although you disagreed with it, did 18 you understand why it had been a Level C 19 infraction? 20 A. Yes, I did. 21 Q. And although you disagreed with it, 22 did you understand Dr. Wu's position about 23 why it was a Level C infraction? 24 A. No.</p>	<p>1 Q. Okay. And why do you think Dr. Wu 2 gave you a Level C infraction? 3 A. I believe he wanted me out of there. 4 Q. Why? 5 A. He didn't like me. Not that he 6 didn't like me personally. He didn't want 7 me to -- he wanted a secretary, basically, 8 and he didn't -- what Justin Shi, who is 9 that associate chair, told me is that "Dr. 10 Wu doesn't want you to ask questions. He 11 doesn't want you to make suggestions. He 12 just wants you to listen to him and do what 13 he says." 14 Q. Why do you believe that Dr. Wu, 15 uhm -- you said, you said that Dr. Wu -- you 16 don't believe Dr. Wu didn't like you; is 17 that right? 18 A. He didn't want me where I was, right. 19 Q. So why do you believe that? 20 A. I don't know. I don't know. I don't 21 know. I, I do believe Dr. Wu liked me, and 22 I liked him, you know, when things were 23 good. 24 Q. So --</p>

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<p>1 A. So I don't think he disliked me. I 2 just think he...</p> <p>3 Q. Do you think he just wanted you to 4 perform different functions in your job?</p> <p>5 A. Right. But without telling me; so I 6 was kind of like working in the dark.</p> <p>7 Q. So there were miscommunications 8 about -- you felt there were 9 miscommunications about what he wanted you 10 to do and what you felt he wanted you to do?</p> <p>11 A. Yes.</p> <p>12 Q. But --</p> <p>13 A. I was in a different building.</p> <p>14 Q. Right. But you, you did feel that 15 you liked him personally and he liked you 16 personally?</p> <p>17 A. Yes.</p> <p>18 Q. There were just misunderstandings 19 about your work assignments?</p> <p>20 A. Exactly, and my role.</p> <p>21 Q. And your role.</p> <p>22 And am I correct that you don't know 23 why there were misunderstandings about your 24 role?</p>	<p>1 people.</p> <p>2 Q. So who did he protect?</p> <p>3 A. He protected Judy from -- and I 4 wanted to -- myself, I didn't want to see 5 Judy lose her job either.</p> <p>6 Q. Why do you feel he protected Judy?</p> <p>7 A. Because he just -- you know, he 8 allowed her, he -- I kept saying, "Dr. Wu, 9 she needs training. She needs to go to 10 computer classes."</p> <p>11 Q. And in what way did he protect her?</p> <p>12 A. He said, "I think the computer" -- 13 "the typewriter is cute."</p> <p>14 Q. And --</p> <p>15 A. "Cute" is the word he used.</p> <p>16 Q. Do you know how long Judy worked for 17 Dr. Wu?</p> <p>18 A. Well, Dr. Wu -- she's been in that 19 department for, I -- you know, from high 20 school or Temple from high school; so she 21 just recently retired, I guess. But I don't 22 know. I mean, the whole -- she was there 23 when he came in. So when he was recruited 24 by Dr. Dai, who I was part of, you know,</p>
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<p>1 A. I can tell you what I think --</p> <p>2 Q. Sure.</p> <p>3 A. -- is the reason. Well, being in 4 another building doesn't help. Uhm, getting 5 emails like "do this," "do" -- I mean, it 6 was not clear, and then it would change and 7 then it would be he'd, you know, change it, 8 "Judy, you do it." It just flipped around 9 all the time.</p> <p>10 And I was always called off of 11 something I was doing without -- oh, I 12 always went, "I'll do it. I'll do it."</p> <p>13 Q. Did he -- is he somebody who has high 14 demands of people who work for him?</p> <p>15 A. Uhm, yes, he does. His faculty. Not 16 all staff, but his faculty.</p> <p>17 Q. And he -- is it fair to say he 18 expects a lot of his employees?</p> <p>19 A. Some, yeah.</p> <p>20 Q. Uhm, and you say "some."</p> <p>21 Does he not expect --</p> <p>22 A. He protected some.</p> <p>23 Q. -- a lot from other employees?</p> <p>24 A. Yeah, yeah. He protected some</p>	<p>1 doing his travel, he, uhm -- she was already 2 there.</p> <p>3 Q. So Judy --</p> <p>4 A. So he inherited her.</p> <p>5 Q. Okay. So Judy was with Dr. Wu from 6 the start of Dr. Wu's employment --</p> <p>7 A. Yes.</p> <p>8 Q. -- at Temple?</p> <p>9 A. Yes.</p> <p>10 Q. And anyone else that you felt Dr. Wu 11 protected other than Judy?</p> <p>12 A. When Alexandra Grinshpun was there. 13 It wasn't protection. It was just not -- 14 letting stuff slide, but yelling at me all 15 the time about that.</p> <p>16 Q. So your opinion was that he let stuff 17 slide for Judy and Alexandra but not for 18 you?</p> <p>19 A. Right.</p> <p>20 Q. And how old is Judy?</p> <p>21 A. Oh, geeze. She's older than me. I 22 would say she's 65, maybe.</p> <p>23 Q. And how old was Alexandra?</p> <p>24 A. Forty-ish. She had small children,</p>

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<p>1 so I'm just guessing.</p> <p>2 Q. And let me correct that both Judy and</p> <p>3 Alexandra are both women?</p> <p>4 A. Yes.</p> <p>5 Q. Anyone else that you felt Dr. Wu</p> <p>6 protected?</p> <p>7 A. Jackie Harriz; Hailey King; Laurie</p> <p>8 Shteir.</p> <p>9 Q. Anyone else?</p> <p>10 A. Tom Stauffer. I mean, there was some</p> <p>11 pretty serious mistakes no one ever got in</p> <p>12 trouble for, and that's why I was surprised.</p> <p>13 Q. Are you aware of anyone else who</p> <p>14 worked in Dr. Wu's office who failed to book</p> <p>15 travel arrangements for a visiting</p> <p>16 candidate?</p> <p>17 A. No, I am not aware of anyone.</p> <p>18 Q. How old is Jackie Harriz?</p> <p>19 A. Well, she retired from Temple, so I'm</p> <p>20 guessing. I don't know, 60-ish, 65.</p> <p>21 Q. How old is Hailey King?</p> <p>22 A. In her late 20s, early 30s.</p> <p>23 Q. How old was Laurie Shteir?</p> <p>24 A. Fifty-ish.</p>	<p>1 something, that was challenging him.</p> <p>2 Q. Did you ask Dr. Shi for input or did</p> <p>3 Dr. --</p> <p>4 A. I did. I did.</p> <p>5 MR. MUNSHI: Just wait until</p> <p>6 she's done --</p> <p>7 THE WITNESS: I'm sorry.</p> <p>8 MR. MUNSHI: -- asking the</p> <p>9 question.</p> <p>10 BY MS. FENDELL-SATINSKY:</p> <p>11 Q. So you asked Dr. Shi for input?</p> <p>12 A. Yes.</p> <p>13 Q. And this is -- what you just</p> <p>14 testified to is what Dr. Shi told you?</p> <p>15 A. Yes.</p> <p>16 Q. Do you know why Dr. Wu did not want</p> <p>17 you to give feedback or make suggestions?</p> <p>18 A. I don't.</p> <p>19 Q. After receiving the disciplinary</p> <p>20 report at D-13, did you understand that you</p> <p>21 were on probation for a year and that any</p> <p>22 further Level C infraction could lead to the</p> <p>23 end of your employment at Temple?</p> <p>24 A. Yes, I did.</p>
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<p>1 Q. How old was Tom Stauffer?</p> <p>2 A. Forty-ish.</p> <p>3 Q. Anyone else that you felt Dr. Wu</p> <p>4 tried to protect?</p> <p>5 A. Not that comes to mind, no.</p> <p>6 Q. You said that, uhm -- Dr. Gi (sic),</p> <p>7 is that correct, the assistant chair?</p> <p>8 A. (No response.)</p> <p>9 Q. You said that --</p> <p>10 MR. MUNSHI: Shi?</p> <p>11 THE WITNESS: Shi?</p> <p>12 MS. FENDELL-SATINSKY: Shi.</p> <p>13 THE WITNESS: Oh, Dr., yeah,</p> <p>14 Justin Shi, yeah.</p> <p>15 MS. FENDELL-SATINSKY: Thank</p> <p>16 you.</p> <p>17 THE WITNESS: Uh-huh.</p> <p>18 BY MS. FENDELL-SATINSKY:</p> <p>19 Q. You said that Dr. Shi told you that</p> <p>20 Dr. Wu wanted a secretary?</p> <p>21 A. No. He said, "He just wants you to</p> <p>22 not give feedback, not make suggestions.</p> <p>23 Don't ask any questions. Just do as he</p> <p>24 says." So if I ask him to clarify</p>	<p>1 ---</p> <p>2 (Whereupon, 11/20/13 email</p> <p>3 string, Bates No. TEMPLE0000658-659,</p> <p>4 was marked as D Exhibit No. 4 for</p> <p>5 identification.)</p> <p>6 ---</p> <p>7 BY MS. FENDELL-SATINSKY:</p> <p>8 Q. Ms. Briggs, the court reporter has</p> <p>9 given you a document that's been marked as</p> <p>10 D-14.</p> <p>11 A. Okay.</p> <p>12 Q. Can you read this document and let me</p> <p>13 know if you've seen it before.</p> <p>14 A. (Witness complies with request.)</p> <p>15 I do. Dr. Wu's letter to me, emailed</p> <p>16 to me. Yes, I understand that.</p> <p>17 Q. And you've seen that before, correct?</p> <p>18 A. Yes. Yes, I have.</p> <p>19 Q. And is this email accurate in that</p> <p>20 you had had several discussions with Dr. Wu</p> <p>21 and Drew about not using Dr. Wu's credit</p> <p>22 card for departmental usage?</p> <p>23 A. That is true.</p> <p>24 Q. And so then Dr. Wu here in D-14 was</p>

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<p>1 sending you a written --</p> <p>2 A. Right.</p> <p>3 Q. -- reminder of that; is that correct?</p> <p>4 A. That is correct. But I didn't make</p> <p>5 these charges.</p> <p>6 Q. But it is accurate that you've had</p> <p>7 several meetings with -- you had had several</p> <p>8 meetings with Dr. Wu and Drew regarding not</p> <p>9 using Dr. Wu's credit card for departmental</p> <p>10 usage?</p> <p>11 A. That is correct. And these were made</p> <p>12 by someone else, I want you to know. His</p> <p>13 card number everyone had.</p> <p>14 Q. Did you monitor his credit card bills</p> <p>15 as part of your job?</p> <p>16 A. I did.</p> <p>17 Q. And did you tell him when there were</p> <p>18 charges to his credit card that shouldn't</p> <p>19 appear?</p> <p>20 A. I did.</p> <p>21 Q. Following the suspension notice that</p> <p>22 was D-13 --</p> <p>23 A. D -- okay.</p> <p>24 Q. -- between then and the end of your</p>	<p>1 TEMPLE0000666-670, was marked as D</p> <p>2 Exhibit No. 15 for identification.)</p> <p>3 ---</p> <p>4 THE WITNESS: Thank you.</p> <p>5 BY MS. FENDELL-SATINSKY:</p> <p>6 Q. So take a look at this document.</p> <p>7 And, again I'm going to ask you if you've</p> <p>8 ever seen it before.</p> <p>9 A. No, I have not.</p> <p>10 Q. Take a look through the whole</p> <p>11 document, and let me know if you've ever</p> <p>12 seen it before.</p> <p>13 A. (Witness complies with request.)</p> <p>14 Okay, say your question.</p> <p>15 Q. Does this refresh your recollection</p> <p>16 that there were instances in which you had</p> <p>17 delayed communications and Dr. Wu spoke with</p> <p>18 you about it between the time of your</p> <p>19 suspension and the end of your employment at</p> <p>20 Temple?</p> <p>21 A. Specifically, I don't recall this</p> <p>22 incident, but I see it here, yes.</p> <p>23 Q. And seeing it, does that refresh your</p> <p>24 recollection at all that --</p>
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<p>1 employment at Temple, did Dr. Wu and</p> <p>2 Mr. DiMeo address other performance issues</p> <p>3 with you?</p> <p>4 A. Yes; Monday, Wednesday, and Friday</p> <p>5 mornings.</p> <p>6 Q. Was one of the things they spoke with</p> <p>7 you about your delay in responding to</p> <p>8 communications?</p> <p>9 A. To, to whom?</p> <p>10 Q. Sure. So you told me that Dr. Wu and</p> <p>11 Mr. DiMeo spoke with you about other</p> <p>12 performance issues between your suspension</p> <p>13 notice and the end of your employment at</p> <p>14 Temple, correct?</p> <p>15 A. Yes.</p> <p>16 Q. So I asked if one of the things they</p> <p>17 spoke with you about was your delay in</p> <p>18 responding to communications.</p> <p>19 A. He did. But I didn't delay. I don't</p> <p>20 believe I delayed. Five minutes I don't</p> <p>21 think, is his email, is not a delay.</p> <p>22 ---</p> <p>23 (Whereupon, 11/20/13 email</p> <p>24 regarding another example, Bates No.</p>	<p>1 A. It does.</p> <p>2 Q. -- there were instances -- let me</p> <p>3 finish my question.</p> <p>4 Does seeing this exhibit at D-15</p> <p>5 refresh your recollection that there were</p> <p>6 instances in which you were delayed in</p> <p>7 responding to communications?</p> <p>8 A. I don't know where my -- I don't see</p> <p>9 my emails to Ms. Hecht, or his response to</p> <p>10 me, "When do you want to go?"</p> <p>11 Q. So my question is a little bit</p> <p>12 different.</p> <p>13 MS. FENDELL-SATINSKY: Could</p> <p>14 you read back my question, please.</p> <p>15 THE COURT REPORTER: Uh-huh.</p> <p>16 MS. FENDELL-SATINSKY: Thank</p> <p>17 you.</p> <p>18 ---</p> <p>19 (Whereupon, the court reporter</p> <p>20 read back the following question:</p> <p>21 Q Does seeing this exhibit at</p> <p>22 D-15 refresh your recollection that</p> <p>23 there were instances in which you</p> <p>24 were delayed in responding to</p>

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<p>1 communications?)</p> <p>2 ---</p> <p>3 THE WITNESS: Isn't that like,</p> <p>4 "When did you stop beating your</p> <p>5 wife"? I mean, I'm sorry, but</p> <p>6 you're asking me if it's true that</p> <p>7 the communications were delayed or</p> <p>8 Dr. Wu accused me? I'm not --</p> <p>9 MS. FENDELL-SATINSKY: No.</p> <p>10 BY MS. FENDELL-SATINSKY:</p> <p>11 Q. I'm going to ask the court</p> <p>12 reporter --</p> <p>13 A. I --</p> <p>14 Q. I'm going to ask the court reporter</p> <p>15 to read back my --</p> <p>16 A. Okay.</p> <p>17 Q. -- question again.</p> <p>18 MR. MUNSHI: And if you don't</p> <p>19 understand the question, just say</p> <p>20 you don't understand the question.</p> <p>21 MS. FENDELL-SATINSKY: And,</p> <p>22 Ms. Briggs, as I've told you</p> <p>23 throughout this deposition, if you</p> <p>24 don't understand a question, I don't</p>	<p>1 three-times-a-week meetings with Andrew</p> <p>2 DiMeo and Dr. Wu; is that correct?</p> <p>3 A. That is correct.</p> <p>4 Q. And when did those meetings start?</p> <p>5 A. I think they started probably the</p> <p>6 fall of 2013.</p> <p>7 Q. Did those meetings start after you</p> <p>8 spoke with Mr. Wacker about needing somebody</p> <p>9 or wanting somebody to help "mediate," I</p> <p>10 think were your words, between you and</p> <p>11 Dr. Wu?</p> <p>12 A. Actually, I didn't ask Greg. I asked</p> <p>13 Deirdre. But I -- these -- the meetings</p> <p>14 started out more as like let's go over</p> <p>15 what's going on in the department. They</p> <p>16 started out as informative, no problem at</p> <p>17 all.</p> <p>18 So, that's not how they started out.</p> <p>19 It's just the tone of them changed, the door</p> <p>20 was shut, and, you know, staff are like,</p> <p>21 "What's going on with Ruth?" I -- they just</p> <p>22 changed in tone to be -- to being, you know,</p> <p>23 confrontive. It really wasn't about what's</p> <p>24 going on in the department. It's like where</p>
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<p>1 want me to tell you that.</p> <p>2 Rahul, I'm going to ask you --</p> <p>3 THE WITNESS: Okay.</p> <p>4 MS. FENDELL-SATINSKY: -- to</p> <p>5 stop telling the witness that if she</p> <p>6 doesn't understand the question she</p> <p>7 should tell me that. I've given her</p> <p>8 that instruction numerous times</p> <p>9 today, and she's indicated she</p> <p>10 understands that instruction.</p> <p>11 MR. MUNSHI: Fine. Now you</p> <p>12 remember.</p> <p>13 ---</p> <p>14 (Whereupon, the court reporter</p> <p>15 read back the following question:</p> <p>16 Q Does seeing this exhibit at</p> <p>17 D-15 refresh your recollection that</p> <p>18 there were instances in which you</p> <p>19 were delayed in responding to</p> <p>20 communications?)</p> <p>21 ---</p> <p>22 THE WITNESS: No.</p> <p>23 BY MS. FENDELL-SATINSKY:</p> <p>24 Q. You mentioned earlier that you had</p>	<p>1 did you do something wrong.</p> <p>2 Q. You told me earlier that you -- one</p> <p>3 of the reasons that you believe Mr. Wacker</p> <p>4 created a hostile work environment for you</p> <p>5 was because he did not respond to your</p> <p>6 requests for help to mediate between</p> <p>7 yourself and Dr. Wu; is that correct?</p> <p>8 A. Okay, all right. But that was when</p> <p>9 the -- yes, okay, you're right.</p> <p>10 Q. Okay. So that's correct?</p> <p>11 A. That is correct.</p> <p>12 Q. And so following that request, did</p> <p>13 these meetings with Mr. DiMeo and Dr. Wu</p> <p>14 start?</p> <p>15 A. No. They had started before that.</p> <p>16 Q. So the meetings with Mr. DiMeo and</p> <p>17 Dr. Wu started before you asked for someone</p> <p>18 to mediate between you and Dr. Wu to</p> <p>19 Mr. Wacker?</p> <p>20 A. Yes.</p> <p>21 Q. When did you make that request to</p> <p>22 Mr. Wacker?</p> <p>23 A. I don't know the date.</p> <p>24 Q. Was it an oral request or a written</p>

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<p>1 request?</p> <p>2 A. I think it was -- I think I did it in</p> <p>3 email. But I'm guessing. I have to look.</p> <p>4 Q. If you did it in an email, would that</p> <p>5 be one of the emails that you would have</p> <p>6 imported into your gmail?</p> <p>7 A. Yeah, it would have been, probably.</p> <p>8 Q. Okay. And I will tell you that we</p> <p>9 don't have that email.</p> <p>10 A. Okay.</p> <p>11 Q. So, again, if you can look for that</p> <p>12 email. And if it exists, give it to your</p> <p>13 attorney, please.</p> <p>14 You said that, the meetings, the door</p> <p>15 began to close at meetings; is that correct?</p> <p>16 A. Yes.</p> <p>17 Q. Where were the meetings held?</p> <p>18 A. In his office, Dr. Wu's office.</p> <p>19 Q. Were all of the meetings held in</p> <p>20 Dr. Wu's office?</p> <p>21 A. Yes.</p> <p>22 Q. And the way the office was set up,</p> <p>23 could other people see and hear things from</p> <p>24 Dr. Wu's office if the door was open?</p>	<p>1 A. Yes.</p> <p>2 Q. Why did -- do you know why those</p> <p>3 people came up to you?</p> <p>4 A. Because two of them are faculty,</p> <p>5 young faculty members. They said it feels</p> <p>6 so uncomfortable to hear it.</p> <p>7 Q. What did they tell you they were</p> <p>8 hearing?</p> <p>9 A. Him yelling at me.</p> <p>10 Q. About what?</p> <p>11 A. Anything. "Get me a coffee" or, you</p> <p>12 know, maybe something about this</p> <p>13 (indicating).</p> <p>14 Q. Do you know what they heard you</p> <p>15 yelling about, or are you guessing?</p> <p>16 I'm sorry. Do you know what they</p> <p>17 heard Dr. Wu yelling about --</p> <p>18 A. They knew that --</p> <p>19 Q. -- or are you guessing?</p> <p>20 A. I don't know if they knew the</p> <p>21 content, but they could tell by the, by the</p> <p>22 tone that it was, you know, it was harsh.</p> <p>23 Q. Did they tell you what they felt what</p> <p>24 Dr. Wu --</p>
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<p>1 A. If the door was open, they could hear</p> <p>2 and see. If the door was closed, they could</p> <p>3 hear.</p> <p>4 Q. How could they hear if the door was</p> <p>5 closed?</p> <p>6 A. Yell.</p> <p>7 Q. So they could hear if he yelled.</p> <p>8 But, otherwise, could they hear what was</p> <p>9 going on in Dr. Wu's office?</p> <p>10 A. Yes. And the only reason I know is</p> <p>11 that people would come up and tell me they</p> <p>12 were sorry and they felt bad for me. I'm</p> <p>13 like, "I didn't know you could hear that."</p> <p>14 Q. Why did people come up and say they</p> <p>15 were sorry and felt bad for you?</p> <p>16 MR. MUNSHI: Just objection to</p> <p>17 form.</p> <p>18 You can answer it if you</p> <p>19 understand.</p> <p>20 THE WITNESS: I --</p> <p>21 BY MS. FENDELL-SATINSKY:</p> <p>22 Q. You testified that people came up to</p> <p>23 you and said they were sorry and felt bad</p> <p>24 for you, correct?</p>	<p>1 A. No.</p> <p>2 Q. Let me step back.</p> <p>3 Did they tell you what they heard</p> <p>4 Dr. Wu yelling about?</p> <p>5 A. They did not say that.</p> <p>6 Q. Other than the two faculty, did</p> <p>7 anyone tell you that they heard any</p> <p>8 discussions between Dr. -- between you and</p> <p>9 Dr. Wu in Dr. Wu's office?</p> <p>10 A. Some of the PhD candidates.</p> <p>11 Q. How many?</p> <p>12 A. Ten, maybe.</p> <p>13 Q. Did they tell you what they heard</p> <p>14 between you and Dr. Wu in Dr. Wu's office?</p> <p>15 A. Not the -- no.</p> <p>16 Q. What did they tell you?</p> <p>17 A. "Why does he yell at you all the</p> <p>18 time?"</p> <p>19 Q. And did they express that he too had</p> <p>20 yelled at them?</p> <p>21 A. They weren't his graduate students,</p> <p>22 so, no, they did not.</p> <p>23 Q. So he only yelled at his graduate</p> <p>24 students?</p>

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<p>1 A. Yes.</p> <p>2 MR. MUNSHI: Could we take two</p> <p>3 minutes at a good time?</p> <p>4 MS. FENDELL-SATINSKY: I am</p> <p>5 just in the middle of a question, a</p> <p>6 series of questions.</p> <p>7 MR. MUNSHI: That's why I said</p> <p>8 "at a good time."</p> <p>9 MS. FENDELL-SATINSKY: Okay.</p> <p>10 Oh, I thought you said --</p> <p>11 MR. MUNSHI: At a good -- I'll</p> <p>12 say: At a good time, can you let us</p> <p>13 know?</p> <p>14 MS. FENDELL-SATINSKY: Sure.</p> <p>15 MR. MUNSHI: We can take two</p> <p>16 minutes then.</p> <p>17 MS. FENDELL-SATINSKY: Sure.</p> <p>18 BY MS. FENDELL-SATINSKY:</p> <p>19 Q. Do you believe it's appropriate to</p> <p>20 discuss performance issues or errors in an</p> <p>21 open-door meeting?</p> <p>22 A. No.</p> <p>23 Q. And do you believe it's more</p> <p>24 appropriate to discuss those type of issues</p>	<p>1 BY MS. FENDELL-SATINSKY:</p> <p>2 Q. Did you understand that the meetings</p> <p>3 were partially intended to help improve</p> <p>4 communications between --</p> <p>5 A. That's what I was told.</p> <p>6 Q. -- you and Dr. Wu?</p> <p>7 A. Yes. That's what I was told.</p> <p>8 Q. And who told you that?</p> <p>9 A. Greg and Drew.</p> <p>10 Q. And you said during the meetings Drew</p> <p>11 and Dr. Wu would discuss performance issues;</p> <p>12 is that right?</p> <p>13 A. Yeah.</p> <p>14 Q. And did they identify performance</p> <p>15 issues during the meetings?</p> <p>16 A. Yeah.</p> <p>17 Q. And by identifying the performance</p> <p>18 issues, did you understand those were areas</p> <p>19 in which they expected improvement from you?</p> <p>20 A. Yes.</p> <p>21 MS. FENDELL-SATINSKY: We can</p> <p>22 take a quick break.</p> <p>23 MR. MUNSHI: Thank you.</p> <p>24 THE VIDEOGRAPHER: This</p>
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<p>1 in a closed-door meeting?</p> <p>2 A. Closed-door.</p> <p>3 Q. And having a closed-door meeting also</p> <p>4 gives more privacy, correct?</p> <p>5 A. For a meeting as you said, yes.</p> <p>6 Q. Well, it gives more privacy because</p> <p>7 people can't see in, right?</p> <p>8 A. They can't see, right.</p> <p>9 Q. And it's -- I understand your</p> <p>10 testimony is that Dr. Wu yelled, so people</p> <p>11 could hear him, but it's harder to hear in a</p> <p>12 closed-door --</p> <p>13 A. Exactly, yes.</p> <p>14 Q. -- meeting than an open-door meeting?</p> <p>15 A. Uh-huh. Yes, I agree with you.</p> <p>16 Q. Were the meetings partially intended</p> <p>17 to improve communications?</p> <p>18 MR. MUNSHI: Just objection to</p> <p>19 form.</p> <p>20 MS. FENDELL-SATINSKY: Between</p> <p>21 you and Dr. Wu.</p> <p>22 MR. MUNSHI: Objection to</p> <p>23 form.</p> <p>24 Go ahead.</p>	<p>1 concludes video No. 3. We're going</p> <p>2 off the record at 3:17.</p> <p>3 ---</p> <p>4 (Whereupon, a brief recess was</p> <p>5 taken from 3:17 until 3:26 p.m.)</p> <p>6 ---</p> <p>7 THE VIDEOGRAPHER: The time is</p> <p>8 3:26.</p> <p>9 Back on the record.</p> <p>10 BY MS. FENDELL-SATINSKY:</p> <p>11 Q. Ms. Briggs, in January of 2014, did</p> <p>12 you receive a disciplinary report?</p> <p>13 A. January of 2014?</p> <p>14 Q. Yes.</p> <p>15 A. I know of all of them. I just don't</p> <p>16 know the dates.</p> <p>17 Q. Okay.</p> <p>18 ---</p> <p>19 (Whereupon, 1/20/14</p> <p>20 disciplinary report, Bates No.</p> <p>21 TEMPLE0170, was marked as D Exhibit</p> <p>22 No. 16 for identification.)</p> <p>23 ---</p> <p>24</p>

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<p>1 BY MS. FENDELL-SATINSKY: 2 Q. Have you seen this document marked as 3 D-16 before? 4 A. Yes, I have. 5 Q. And is this a disciplinary report 6 from January 20th, 2014 from Dr. Wu to you? 7 A. Correct. 8 Q. If you look down at the bottom where 9 it says "employee signature," is that your 10 name and your signature? 11 A. That is my name, yes. 12 Q. And your signature? 13 A. Uh-huh. 14 Q. Is that a "yes"? 15 A. Yes. I'm sorry. 16 Q. And below you, is that Andrew DiMeo's 17 name and signature? 18 A. That -- uh, it is. I can't justify 19 to whether it's his, but that is what it 20 says. 21 Q. Did Mr. DiMeo meet with you to issue 22 this discipline? 23 A. I don't know, because I can't 24 remember what it was for. This -- there was</p>	<p>1 in which you overslept and reported to work 2 three hours late that we have not discussed? 3 A. Could you, could you -- 4 Q. Sure. So, earlier you testified 5 about an instance in which you reported to 6 work three hours late. 7 A. Right. 8 Q. Because you overslept, correct? 9 A. Correct. 10 Q. And that's what this discipline that 11 was marked as D-16 was for, correct? 12 A. Correct. 13 Q. So I was asking whether there's 14 anything related to the incident that 15 resulted in the discipline at D-16 that we 16 have not talked about. 17 A. Yes. 18 Q. What? 19 A. I was basically called a liar. No 20 one would even contact -- when they talk 21 about there being procedures and protocol, 22 there was no protocol in that department. 23 Q. Did you ever observe anyone in your 24 office reporting to work three hours late</p>
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<p>1 no explanation. 2 Q. Did this discipline relate to the 3 incident you discussed earlier when you 4 overslept? 5 A. Okay. Then he did come to the 6 office. He came up to my office. 7 Q. Mr. DiMeo? 8 A. Yes. 9 Q. And did he come with Mr. Wu? 10 A. No. 11 Q. Just Mr. DiMeo? 12 A. Yes. 13 Q. But this discipline resulted from the 14 incident you discussed earlier when you 15 overslept for three hours, correct? 16 A. Yes. 17 Q. And you understood that this was a 18 violation -- uhm, I'm sorry. 19 You understood that this was a Type B 20 violation, correct? 21 A. Yes. 22 Q. And that this was a written warning? 23 A. Yes. 24 Q. Was there anything about the incident</p>	<p>1 without informing somebody else in the 2 office? 3 A. I don't know if it was three hours. 4 I know someone who didn't come in for three 5 days. 6 Q. Without reporting that they -- 7 A. Without reporting. 8 Q. -- were going to be out? 9 A. Yup. 10 Q. Who was that? 11 A. Hailey King. 12 Q. Do you know of the circumstances why 13 Ms. King did not report to work for three 14 days? 15 A. Well, she didn't call -- no, I don't, 16 no. Dr. Wu was traveling at the time and... 17 Q. Do you know if she had previously 18 spoken with Dr. Wu about that? 19 A. She did not. 20 Q. How do you know that? 21 A. Because Dr. Wu didn't know about it, 22 he said. 23 Q. Do you know if Ms. King was ill? 24 A. I didn't ask her. She was pretty</p>

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<p>1 new. I didn't ask her.</p> <p>2 Q. Did you ask -- did you know if</p> <p>3 Ms. King had an emergency?</p> <p>4 A. I don't know.</p> <p>5 Q. So you don't know why Ms. King was --</p> <p>6 did not report to work for three days?</p> <p>7 A. No, I don't.</p> <p>8 Q. Okay. Was there anyone else who</p> <p>9 reported to work three hours late and did</p> <p>10 not report that they were going to be three</p> <p>11 hours late?</p> <p>12 A. Three hours or just --</p> <p>13 Q. Yes.</p> <p>14 A. -- tardiness?</p> <p>15 Okay. I don't know of anyone, but</p> <p>16 I'm not nosey.</p> <p>17 Q. And who called you a liar?</p> <p>18 A. I can't say that anybody called me a</p> <p>19 liar. They said I was lying.</p> <p>20 Q. About what?</p> <p>21 A. About Dr. Wu's accusations.</p> <p>22 Q. About what?</p> <p>23 A. About all of these emails.</p> <p>24 Q. Okay. So, I am focused right now --</p>	<p>1 A. There might have been five or ten</p> <p>2 minutes, but no.</p> <p>3 Q. So you, you don't believe that you</p> <p>4 called in late or took off anytime between</p> <p>5 January 2014 and April 2014; is that your</p> <p>6 testimony?</p> <p>7 A. Can we do lateness and absentee?</p> <p>8 Q. Sure.</p> <p>9 A. Okay.</p> <p>10 Q. So, do you believe that you were</p> <p>11 absent, that you were absent anytime between</p> <p>12 January 2014 and April 2014?</p> <p>13 A. I don't recall.</p> <p>14 Q. Do you have an estimate of how many</p> <p>15 days you called in late between January 2014</p> <p>16 and April 2014?</p> <p>17 A. Maybe three times. And I'm talking</p> <p>18 five or ten minutes.</p> <p>19 Q. Was there an incident in which you</p> <p>20 made an error in booking hotel reservations</p> <p>21 for a colloquium speaker?</p> <p>22 A. Yes.</p> <p>23 Q. Tell me about that.</p> <p>24 A. I'm sorry?</p>
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<p>1 A. On the, on the, I'm sorry, the</p> <p>2 disciplines.</p> <p>3 Q. So I'm focused right now just on the</p> <p>4 incident in which you overslept for three</p> <p>5 hours and reported to work late.</p> <p>6 A. Right.</p> <p>7 Q. Okay? And you testified about that</p> <p>8 incident earlier, right?</p> <p>9 A. Yes.</p> <p>10 Q. So my question to you was: Is there</p> <p>11 anything else about that incident that you</p> <p>12 did not already testify about?</p> <p>13 A. Uhm, no, I don't think so. I was</p> <p>14 surprised when Drew gave it to me, actually.</p> <p>15 Q. Why were you surprised?</p> <p>16 A. Because tardiness was and absenteeism</p> <p>17 was not an issue for me. And I worked till</p> <p>18 whenever they needed me so that -- even that</p> <p>19 night I was there till like 9:00 or 10:00.</p> <p>20 Q. Do you have an estimate of how many</p> <p>21 days you called in late or took off work</p> <p>22 between January 2014 and April 2014?</p> <p>23 A. Well, this one.</p> <p>24 Q. Okay. So, one.</p>	<p>1 Q. Tell me about that.</p> <p>2 A. I booked the reservations at Club</p> <p>3 Quarters for the speaker as I was told to.</p> <p>4 Dr. Wu had the date wrong.</p> <p>5 Q. So was it your position that the</p> <p>6 error was not your fault?</p> <p>7 A. That one was not my fault.</p> <p>8 Q. Did you ever fail to submit Dr. Wu's</p> <p>9 expense reports in a timely manner?</p> <p>10 A. No, I did not.</p> <p>11 Q. Your testimony is that you always</p> <p>12 submitted Dr. Wu's expense --</p> <p>13 A. In a timely manner, yes.</p> <p>14 Q. It's your testimony that you always</p> <p>15 submitted Dr. Wu's expense reports in a</p> <p>16 timely manner?</p> <p>17 A. Right.</p> <p>18 Q. Is that "yes"?</p> <p>19 A. That is "yes."</p> <p>20 Q. Is it your testimony that you always</p> <p>21 submitted Dr. Wu's expense reports within</p> <p>22 the time that he requested they be</p> <p>23 completed?</p> <p>24 A. No, I did not.</p>

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<p>1 Q. So there were instances in which you</p> <p>2 did not complete Dr. Wu's expense reports</p> <p>3 within the time Dr. Wu wanted you to</p> <p>4 complete them?</p> <p>5 A. That is correct.</p> <p>6 Q. And we talked about earlier expense</p> <p>7 reports were a part of your job</p> <p>8 responsibilities in working for Dr. Wu,</p> <p>9 right?</p> <p>10 A. Yes. I did them.</p> <p>11 Q. Just not on time.</p> <p>12 A. Not in three hours, no.</p> <p>13 Q. Your employment with Temple ended on</p> <p>14 April 1st, 2014; is that correct?</p> <p>15 A. That is correct.</p> <p>16 Q. Do you recall an incident in March of</p> <p>17 2014 when you were instructed to complete a</p> <p>18 travel reimbursement expense for Dr. Wu by</p> <p>19 the end of the day?</p> <p>20 A. Not specifically, but there are</p> <p>21 times, yes, uh-huh.</p> <p>22 Q. Do you -- during the meetings you had</p> <p>23 with Drew and Dr. Wu, did you become</p> <p>24 argumentative in any of those meetings?</p>	<p>1 A. Well, one of them is that they</p> <p>2 wouldn't -- that I had called in. They kept</p> <p>3 saying I didn't. I said, "I did call in."</p> <p>4 Q. And --</p> <p>5 A. And it was their word against mine.</p> <p>6 Q. You said that when you called in you</p> <p>7 reported it to a student worker, correct?</p> <p>8 A. That's the only person who was there.</p> <p>9 Q. Anything else that you felt Drew and</p> <p>10 Dr. Wu were lying about with regard to you?</p> <p>11 A. I don't believe that it was Drew</p> <p>12 doing it intentionally to me. I will say</p> <p>13 that first. But looking at these emails, I</p> <p>14 don't -- I can -- him forwarding an email</p> <p>15 saying I didn't complete something when he</p> <p>16 didn't answer my question makes it look out</p> <p>17 to me -- that is just what -- the general</p> <p>18 way it went for me.</p> <p>19 Q. Why did you believe Dr. Wu was</p> <p>20 calling you a liar?</p> <p>21 A. I really believe he just wanted me to</p> <p>22 go, disappear.</p> <p>23 Q. And is that because you believed that</p> <p>24 he wanted you to do different tasks than you</p>
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<p>1 A. In the end, I did. I hadn't -- I</p> <p>2 felt -- they were lying about me, and no one</p> <p>3 would listen to me. H.R. wouldn't listen to</p> <p>4 me. No one would listen to me.</p> <p>5 Q. What were they lying about?</p> <p>6 A. Well, they were saying I didn't call</p> <p>7 in on that day that I was three hours late,</p> <p>8 which is not the truth. I asked them to</p> <p>9 please investigate it, I'm not lying, and</p> <p>10 they said they wouldn't.</p> <p>11 Q. And on that day when you were three</p> <p>12 hours late, you didn't call in until you</p> <p>13 were three hours late, correct?</p> <p>14 A. As soon as I got up. And I came to</p> <p>15 work immediately. I mean, I was there to</p> <p>16 work in ten minutes.</p> <p>17 Q. And that was three hours after you</p> <p>18 were due to report to work, correct?</p> <p>19 A. Yes.</p> <p>20 Q. And you did not call in until you</p> <p>21 woke up, which was three hours late?</p> <p>22 A. That is correct.</p> <p>23 Q. Anything else that you told Drew and</p> <p>24 Dr. Wu were calling you a liar about?</p>	<p>1 wanted --</p> <p>2 A. Not at all.</p> <p>3 Q. -- to do, as testified?</p> <p>4 A. Oh, no, not at all.</p> <p>5 Q. So why do you believe he wanted you</p> <p>6 gone?</p> <p>7 A. I can't answer for him. I'm sorry.</p> <p>8 Q. You don't know why?</p> <p>9 A. I don't know why.</p> <p>10 Q. And you don't have a belief as to</p> <p>11 why?</p> <p>12 A. I do.</p> <p>13 Q. Okay. So what's your belief?</p> <p>14 A. I knew that when I got that first,</p> <p>15 that three-day suspension, that I could not</p> <p>16 bid on another job. And I had tried</p> <p>17 desperately to get -- I didn't want to be</p> <p>18 there if he didn't want me there either.</p> <p>19 You know, I even said to him, "Dr. Wu, if</p> <p>20 you don't want me here, help me get out. If</p> <p>21 you don't want me here, I don't want to be</p> <p>22 here."</p> <p>23 But I couldn't bid on jobs when I was</p> <p>24 on probation. Deirdre finally lifted it</p>

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<p>1 after about -- after I got that, that other 2 one, then it added another year to it. So 3 she lifted that so I could apply for jobs, 4 but for a year I couldn't apply for jobs. 5 And that's what Greg was telling me, "Apply 6 for jobs." 7 I'm like, "I can't." 8 Q. And that's why you believe Dr. Wu 9 wanted you out? 10 A. Well, if there's enough -- if you 11 have enough disciplinary reports, you 12 just -- that's what the rule book says. 13 Q. Right. My question was why do you 14 believe Dr. Wu wanted you out, and you said 15 you couldn't answer that question. 16 A. I don't know what's in his head. 17 Q. Okay. So my question was: Why do 18 you believe he wanted you out? 19 A. I don't know. 20 Q. So you don't have any belief as to 21 why he wanted you out? 22 A. I do. 23 Q. Okay. So, again, for the third time 24 I have asked to you tell me.</p>	<p>1 Again, for the third or fourth time, 2 my question is: Why do you believe that 3 Dr. Wu wanted you out? And, again, those 4 are your words. 5 A. I believe he wanted a younger 6 secretary that wasn't as problematic to his 7 budget, and it seemed likely that it be 8 Ruth. I was the only one who wasn't in a 9 union in the department, and I had no 10 recourse. 11 Q. So you believe that he wanted a 12 younger secretary? 13 A. He wanted a secretary, right. 14 Q. He wanted a secretary. 15 A. A secretary, yes. 16 Q. And you were not a secretary, 17 correct? 18 A. I am not a secretary. 19 Q. So you believe he wanted somebody in 20 a different role than you? 21 A. I do. 22 Q. And somebody who cost less than you 23 cost? 24 A. Yes.</p>
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<p>1 A. Do I have to say? I mean, it's 2 personal. Is it really part of the 3 testimony that I believe he didn't like me? 4 I mean, is that important? 5 Q. It is, actually, Ms. Briggs. You've 6 brought a lawsuit against -- 7 A. I do believe that he didn't -- 8 Q. -- against -- 9 A. -- like me. 10 Q. Let me finish. 11 You've brought a lawsuit against 12 Temple University. It's a serious 13 allegation in federal court. I'm entitled 14 to ask you questions today unless your 15 attorney directs you not to -- 16 A. Okay. 17 Q. -- answer the questions -- 18 A. I'm sorry. 19 Q. -- under limited circumstances. 20 A. I'm sorry. 21 Q. So you do have to answer my 22 question -- 23 A. Okay. 24 Q. -- as asked.</p>	<p>1 Q. Is there any other reasons that you 2 believed that Dr. Wu wanted you out? 3 A. No. 4 Q. Ultimately, you resigned from Temple, 5 correct? 6 A. Under duress. I was given a chance 7 to be terminated or submit my resignation. 8 Q. So you were given a choice, correct? 9 A. Yes. 10 Q. And you chose resignation, correct? 11 A. I did. And the reason is that 12 Deirdre said I could continue to bid on 13 internal jobs at Temple. 14 --- 15 (Whereupon, 4/3/14 resignation 16 email, Bates No. TEMPLE0088, was 17 marked as D Exhibit No. 17 for 18 identification.) 19 --- 20 THE COURT REPORTER: 21 Seventeen. 22 BY MS. FENDELL-SATINSKY: 23 Q. Ms. Briggs, have you seen this 24 document before?</p>

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<p>1 A. Yes.</p> <p>2 Q. And is this your resignation letter?</p> <p>3 A. Yes, it is.</p> <p>4 Q. This is dated April 3rd, 2014,</p> <p>5 correct?</p> <p>6 A. That is correct.</p> <p>7 Q. And it indicates that your</p> <p>8 resignation is effective April 1st, 2014,</p> <p>9 correct?</p> <p>10 A. That is correct.</p> <p>11 Q. The fact that you resigned from</p> <p>12 Temple, has that enabled you to tell</p> <p>13 potential employers that you resigned?</p> <p>14 A. I only had two interviews since then,</p> <p>15 and it came up and I said I resigned. One</p> <p>16 of them was internal, and one was at the</p> <p>17 Community College of Philadelphia.</p> <p>18 Q. In connection with your resignation,</p> <p>19 were you told that no challenges would be</p> <p>20 made to your application for Unemployment</p> <p>21 Compensation?</p> <p>22 A. When I asked a question, yes, Deirdre</p> <p>23 told me that it fell on Temple. If they say</p> <p>24 that they are going to agree to it, then</p>	<p>1 D Exhibit No. 18 for</p> <p>2 identification.)</p> <p>3 - - -</p> <p>4 BY MS. FENDELL-SATINSKY:</p> <p>5 Q. Ms. Briggs, I've given you a document</p> <p>6 that's been marked as D-18. Again, my first</p> <p>7 question to you is going to be whether</p> <p>8 you've seen this document before.</p> <p>9 A. Yes, I have.</p> <p>10 Q. And this is a letter from Mr. Wacker</p> <p>11 to you, correct?</p> <p>12 A. That's correct.</p> <p>13 Q. Did Mr. Wacker give you this letter</p> <p>14 in-person?</p> <p>15 A. Yes.</p> <p>16 Q. Was there anyone else in the meeting</p> <p>17 for --</p> <p>18 A. Deirdre Walton.</p> <p>19 Q. Let me finish my question.</p> <p>20 A. I'm sorry.</p> <p>21 Q. Was there anyone else in the meeting</p> <p>22 with Dr. -- with Mr. Wacker when he gave you</p> <p>23 D-18?</p> <p>24 A. Deirdre Walton.</p>
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<p>1 that's where the appeal thing starts.</p> <p>2 Q. And did Deirdre tell you that no</p> <p>3 challenge would be made to your request?</p> <p>4 A. She did tell me that.</p> <p>5 Q. And was no challenge, in fact, made?</p> <p>6 A. No challenge was made, but they also</p> <p>7 told me to write down that I resigned.</p> <p>8 Q. Did you ultimately receive</p> <p>9 Unemployment Compensation?</p> <p>10 A. Uhm, after appeal.</p> <p>11 Q. But you ultimately received</p> <p>12 Unemployment Compensation; is that correct?</p> <p>13 A. Yes; about eight weeks afterwards.</p> <p>14 Q. And the Unemployment Compensation you</p> <p>15 received, was that backdated? So did you</p> <p>16 receive it going back --</p> <p>17 A. It was back --</p> <p>18 Q. -- to the time of --</p> <p>19 A. Yes, it was.</p> <p>20 Q. -- your resignation?</p> <p>21 A. Yes, it was.</p> <p>22 - - -</p> <p>23 (Whereupon, 4/1/14 letter,</p> <p>24 Bates No. TEMPLE0171, was marked as</p>	<p>1 Q. Anyone else?</p> <p>2 A. No.</p> <p>3 Q. Where was the meeting?</p> <p>4 A. It was in the third-floor dean's</p> <p>5 office conference room in Walkman Hall --</p> <p>6 no. Conwell, I'm sorry, Conwell.</p> <p>7 Q. What were -- were you told there was</p> <p>8 a purpose to the meeting?</p> <p>9 A. No. I didn't...</p> <p>10 Q. And what occurred during the meeting?</p> <p>11 A. I walked in the room. I didn't see</p> <p>12 Deirdre immediately. I just -- Greg had</p> <p>13 called me. When I came in, he said, "Look,</p> <p>14 we have a meeting. Can you come down?"</p> <p>15 And I was actually meeting with Sandy</p> <p>16 Foehl that morning, and I didn't want to</p> <p>17 cancel the meeting. And I told him I</p> <p>18 couldn't be there till 10:30.</p> <p>19 He said, "Well, when you get," you</p> <p>20 know -- "just come to my office when you get</p> <p>21 back."</p> <p>22 So, I did. I'm like, "I'm back."</p> <p>23 And he said, "Let's go in the</p> <p>24 conference room."</p>

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<p>1 So I just started walking ahead of</p> <p>2 him, and he was behind me. And then I heard</p> <p>3 Deirdre, and I looked. I went, "This is</p> <p>4 probably not an April Fools joke," but...</p> <p>5 Q. And so --</p> <p>6 A. But then they handed me this letter.</p> <p>7 Q. Okay. And what did they tell you?</p> <p>8 A. I can't -- you know what, I cannot</p> <p>9 remember. I was shocked. I was in shock.</p> <p>10 Q. So do you not remember any discussion</p> <p>11 that occurred at that meeting?</p> <p>12 A. No.</p> <p>13 Q. Is it your testimony that the only</p> <p>14 thing you recall about that meeting is where</p> <p>15 the meeting occurred, going into the</p> <p>16 meeting, receiving this letter, and who was</p> <p>17 at the meeting?</p> <p>18 A. Yes. I remember reading the last</p> <p>19 line of the letter.</p> <p>20 Q. Okay. Is there anything else about</p> <p>21 the meeting in which you received D-18 that</p> <p>22 you recall?</p> <p>23 A. No.</p> <p>24 Q. And this letter states that you were</p>	<p>1 Q. Let me --</p> <p>2 A. -- in shock.</p> <p>3 Q. -- finish my question.</p> <p>4 A. I'm sorry.</p> <p>5 Q. Did you not know that the March 2013</p> <p>6 discipline was a Level C or you did not know</p> <p>7 that this April 1st letter reflected Level</p> <p>8 C?</p> <p>9 A. The second, the April 1st.</p> <p>10 Q. Okay.</p> <p>11 A. Oh, was it April 1st? No, March</p> <p>12 20th.</p> <p>13 Q. This letter is dated April 1st --</p> <p>14 A. Oh, but I'm talking about --</p> <p>15 Q. -- correct?</p> <p>16 A. -- the incident. Okay.</p> <p>17 Q. Okay. So when you received this</p> <p>18 letter on April 1st, 2014, did you</p> <p>19 understand that you were being disciplined</p> <p>20 for two Level C violations?</p> <p>21 A. At the time, no.</p> <p>22 Q. And was that part of what you</p> <p>23 classified as being shocked?</p> <p>24 A. Yes.</p>
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<p>1 in violation of two Category C work rules,</p> <p>2 correct?</p> <p>3 A. Uh-huh.</p> <p>4 Q. Is that a "yes"?</p> <p>5 A. That is, I'm sorry, yes.</p> <p>6 Q. And those violations were related to</p> <p>7 incidents, the incidents referenced above in</p> <p>8 the letter in bullet points, correct?</p> <p>9 A. Uh-huh. That -- yes, uh-huh. Sorry.</p> <p>10 Q. And you told me earlier that when you</p> <p>11 received the March 2013 suspension you</p> <p>12 understood that you were on probation for a</p> <p>13 year, correct?</p> <p>14 A. Correct.</p> <p>15 Q. And you understood then that any</p> <p>16 further Level C infraction could lead to the</p> <p>17 end of your employment at Temple, correct?</p> <p>18 A. I did know that. But, quite</p> <p>19 honestly, I didn't really know it was a</p> <p>20 Level C until a week later when I got my</p> <p>21 stuff from the office.</p> <p>22 Q. You didn't know that the March</p> <p>23 2013 --</p> <p>24 A. No. Because I just -- I was --</p>	<p>1 Q. Subsequently, did you come to</p> <p>2 understand that?</p> <p>3 A. Yes.</p> <p>4 Q. And you said, I believe - I apologize</p> <p>5 for asking again - that you were given a</p> <p>6 copy of this letter at the meeting?</p> <p>7 A. Yes.</p> <p>8 Q. What did you do when you left the</p> <p>9 meeting?</p> <p>10 A. It was early. It was like 10:30 in</p> <p>11 the morning. I went -- I was told by Greg I</p> <p>12 could go back to my office and gather my</p> <p>13 belongings and just needed to turn my keys</p> <p>14 back in before he left that day.</p> <p>15 Q. And did you do that?</p> <p>16 A. I did.</p> <p>17 Q. And then did you leave the building?</p> <p>18 A. I packed my stuff up. I was there</p> <p>19 until about 7:00 or 8:00. I knew not to go</p> <p>20 on my computer, because I knew that it</p> <p>21 could, it could be checked. But, yeah, I</p> <p>22 was there, and there was no one else there,</p> <p>23 you know. I didn't have my keys once I shut</p> <p>24 my door, but I locked all my stuff in the</p>

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<p>1 room because I couldn't take it home. I</p> <p>2 didn't have a car.</p> <p>3 Q. So you went back to your office, you</p> <p>4 turned in your keys --</p> <p>5 A. At 5:00 or -- well, before Greg left.</p> <p>6 Q. So at the end of the day --</p> <p>7 A. Yes.</p> <p>8 Q. -- you turned in your keys and you</p> <p>9 locked the door to your office, correct?</p> <p>10 A. No. It was open. I continued to</p> <p>11 work.</p> <p>12 Q. So after your meeting with Greg, you</p> <p>13 continued to work for the whole day?</p> <p>14 A. Yes.</p> <p>15 Q. What did you do that day?</p> <p>16 A. He just told me to get my belongings</p> <p>17 together. And I had, you know, pictures</p> <p>18 and, you know, I had stuff. I used to bring</p> <p>19 stuff for, like, events from my house, so I</p> <p>20 was gathering stuff together.</p> <p>21 Q. So you spent the day gathering things</p> <p>22 together?</p> <p>23 A. Yes. And he also told me to go -- to</p> <p>24 apply for Unemployment that day.</p>	<p>1 BY MS. FENDELL-SATINSKY:</p> <p>2 Q. Did you have an understanding of why</p> <p>3 Mr. Wacker told you to put down that you</p> <p>4 resigned on your Unemployment Compensation</p> <p>5 form?</p> <p>6 A. No, I didn't.</p> <p>7 Q. Did you ask him why?</p> <p>8 A. Yeah. I wanted to know how you got</p> <p>9 Unemployment. I didn't know what was</p> <p>10 eligible and...</p> <p>11 Q. My question is a little different.</p> <p>12 I asked: Did you ask Mr. Wacker why</p> <p>13 he told you to put down that you resigned on</p> <p>14 the form?</p> <p>15 A. No, I didn't.</p> <p>16 Q. During that day, did you -- is that</p> <p>17 when you imported your Temple emails to your</p> <p>18 gmail emails?</p> <p>19 A. No. I had been doing it.</p> <p>20 Q. You had been doing that?</p> <p>21 A. Like since January, I guess.</p> <p>22 Q. So did you do it as you received</p> <p>23 emails?</p> <p>24 A. If, if it applied to me, yes.</p>
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<p>1 Q. And did you do that?</p> <p>2 A. Yes, I did.</p> <p>3 Q. And did you appreciate that</p> <p>4 Mr. Wacker told you that?</p> <p>5 A. I appreciated that I had the</p> <p>6 opportunity to sit there and do it, but he</p> <p>7 told me to write down that I resigned due to</p> <p>8 personal reasons, and that's what I put</p> <p>9 down.</p> <p>10 Q. Did you understand that putting down</p> <p>11 on Unemployment Compensation papers that you</p> <p>12 resigned -- or what did you understand that</p> <p>13 putting your resignation down on</p> <p>14 Unemployment Compensation paperwork do to</p> <p>15 the Unemployment Compensation process?</p> <p>16 MR. MUNSHI: Just objection to</p> <p>17 form.</p> <p>18 THE WITNESS: Okay. Uhm,</p> <p>19 every time you say that, I forget</p> <p>20 the question.</p> <p>21 MS. FENDELL-SATINSKY: Sure.</p> <p>22 THE WITNESS: I'm sorry. I'm</p> <p>23 sorry.</p> <p>24</p>	<p>1 Q. So as you received emails, you</p> <p>2 forwarded them -- or, I'm sorry, as you</p> <p>3 received emails at Temple that you believed</p> <p>4 were pertinent, you imported them from your</p> <p>5 Temple email to your gmail?</p> <p>6 A. I didn't import them then. I printed</p> <p>7 them. I had a file in my documents for me,</p> <p>8 and I just printed them to PDF.</p> <p>9 Q. Right. And then when did you import</p> <p>10 the emails that you printed as PDF into your</p> <p>11 personal email?</p> <p>12 A. I -- it was after I had already left.</p> <p>13 I still had access to -- you know, I had my</p> <p>14 Temple ID and I could still use the computer</p> <p>15 center, and I just asked one of the guys to</p> <p>16 show me how to import my email.</p> <p>17 Q. And did you understand that after you</p> <p>18 resigned from Temple you were to turn in</p> <p>19 your badges and access to Temple?</p> <p>20 A. My what?</p> <p>21 Q. Sure. You said -- how did you get</p> <p>22 into the work center?</p> <p>23 A. I walked. I walked in.</p> <p>24 Q. Did you need an ID?</p>

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<p>1 A. Well, everyone needed an ID, but I 2 didn't need it to get in. Is that what you 3 mean? 4 Q. Well, was it a work center just for 5 people who worked at Temple? 6 A. Where I -- in where I worked? 7 Q. No. 8 A. I don't -- 9 Q. So, you told me that you imported 10 your emails from your Temple email to your 11 gmail -- 12 A. Yes. 13 Q. -- after your employment with Temple 14 ended. 15 A. Right. 16 Q. Correct? 17 A. Correct. 18 Q. And while you still had access to 19 your Temple email, correct? 20 A. Correct. 21 Q. And you told me you did that by 22 walking into a work center at Temple; is 23 that correct? 24 A. To the tech center at Temple, right.</p>	<p>1 you're right. 2 Q. But you assumed that that person knew 3 or believed that you still worked at Temple? 4 A. I don't know. I can't... 5 Q. Did you tell that person you worked 6 at Temple? 7 A. I don't know. 8 Q. You don't remember? 9 A. I don't remember. 10 Q. You said you understood that 11 resigning enabled you to apply for other 12 jobs at Temple, correct? 13 A. That's what I was told, yes. 14 Q. And you did ultimately apply for 15 other jobs at Temple? 16 A. I did. 17 Q. The work center that you mentioned, 18 did you understand that to be only for 19 people currently affiliated with Temple? 20 A. No, I didn't. I mean, I was still a 21 student there. 22 Q. You were still a student? What do 23 you mean? 24 A. I was taking a class.</p>
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<p>1 Q. The tech center at Temple? 2 A. Uh-huh, right. 3 Q. And is the tech center something 4 that's accessible to the public? 5 A. If, if you have -- you have to sign 6 onto a computer with your Temple passcode. 7 Q. So you need to be affiliated with 8 Temple to access those computers? 9 A. Yes. 10 Q. And you asked somebody who worked in 11 the tech -- 12 A. Center. 13 Q. -- center to help you import your 14 emails? 15 A. Yes. 16 Q. Is that correct? 17 A. That is correct. 18 Q. And did you tell that person that you 19 worked at Temple? 20 A. No. Well, I mean, I assume he knew 21 it. I mean... 22 Q. But at that point you didn't work at 23 Temple, right? 24 A. But I still had access. Right,</p>	<p>1 Q. At that time, you were taking a 2 class? 3 A. At Tyler, yes. 4 Q. At Tyler? 5 A. Well, Tyler is the art school at 6 Temple. 7 Q. And what class were you enrolled in 8 at that time? 9 A. Metalwork, metal workshop, metal 10 fabrication workshop. 11 Q. And do art students have access to 12 that work center? 13 A. All students, all students, faculty, 14 and staff. 15 Q. Some of the emails you imported to 16 your gmail from your Temple email related to 17 Dr. Whaley; is that correct? 18 A. Yes. 19 Q. Okay. And do you understand that 20 it's sensitive when candidates come in to 21 interview they don't necessarily want their 22 current institution to know that they're 23 interviewing? 24 A. Absolutely, yes.</p>

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<p>1 Q. And do you believe that's 2 confidential? 3 A. Yes. 4 Q. And do you take that seriously? 5 A. I take it seriously. 6 Q. Do you understand that Temple had a 7 policy that prohibited you from gaining 8 unauthorized access into a Temple computer? 9 A. I didn't know that, but what -- you 10 mean after I was let go? 11 Q. My question was different. 12 A. Okay. 13 Q. Do you understand that Temple had a 14 policy that -- 15 A. No, I didn't. 16 Q. Let me finish my question. 17 Do you understand that Temple had a 18 policy that prohibited unauthorized access 19 of its computer systems? 20 A. Yes. I guess I did, yeah. 21 Q. And computer systems includes emails, 22 correct? 23 A. Yes. 24 Q. You understood -- let me step back.</p>	<p>1 A. Yes. 2 Q. --through email? 3 And you understood that emails were 4 part of the type of information that had to 5 be protected if there was confidential 6 information? 7 A. Right. 8 Q. And you understand the importance of 9 ensuring that the type of information you 10 described is not released outside of those 11 who are permitted to know it, correct? 12 A. I do. 13 Q. Ms. Briggs, did -- were there any 14 other occasions in which you went to the 15 work center after your employment at Temple 16 ended? 17 A. I met with, uhm -- I'm trying to pull 18 his name out. He was the president of the 19 Alumni Association. He agreed to net -- to 20 be one of the people I networked with, and I 21 met him there for just a meeting about 22 suggestions about how to network. 23 Q. Who was that? 24 A. I'm trying to think of his name right</p>
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<p>1 We talked about one type of 2 confidential information that you had access 3 to during your employment from Dr. Wu, that 4 being information that candidates were 5 coming to interview for faculty positions -- 6 A. Right. 7 Q. -- correct? 8 A. Yes. 9 Q. Did you have access to other types of 10 confidential information in your role as 11 Dr. Wu's executive assistant? 12 A. Yes. 13 Q. What other types of information? 14 A. Promotion and tenure; uhm, salary 15 increases for faculty members; uhm, merit, 16 merit for faculty members. 17 Q. And you understood the importance of 18 keeping that information confidential? 19 A. Absolutely, yes, I do. 20 Q. And there were communications about 21 those subjects through email, correct? 22 A. About -- just generally? 23 Q. Were there communications about those 24 subjects --</p>	<p>1 now. It'll come to me in a second. 2 Q. Did you reach out to him? 3 A. Actually, he, he found out that I was 4 gone. He had come in for a meeting and 5 asked. He just sent me a -- he says, "I 6 hope you're okay. I heard you're not here 7 anymore." 8 Q. How did he contact you? 9 A. By email probably. I had -- I don't 10 know. 11 Q. By which email? 12 A. Well, it had to have been Temple, 13 because I didn't have "rbriggs" until after 14 I was fired. 15 Q. Why did you continue to access your 16 Temple email after the end of your 17 employment with Temple? 18 A. Well, I didn't -- I can honestly say 19 to you that I wasn't accessing my email. I 20 was just getting email that, that was 21 beneficial to my case. I knew that I was 22 going to -- I was being pushed out. 23 Q. You -- 24 A. And I was -- it was defense.</p>

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<p>1 Q. You just told me that the Alumni 2 Association president contacted you by email 3 to suggest -- 4 A. Or he called. I'm not sure if he 5 called or contacted. You know, he had my 6 number. 7 Q. So is it your testimony that 8 following the end of your employment at 9 Temple you never read a single email in your 10 Temple email account? 11 A. Ones I had gotten, I did. 12 Q. So you did continue to access your 13 email after -- 14 A. Yes. 15 Q. -- the end of your employment at 16 Temple? 17 A. But not anything new. There was 18 nothing really there anyway. 19 Q. Well, there was maybe an email from 20 the Alumni Association president; is that 21 correct? 22 A. I'm thinking we talked on the phone. 23 I can't really remember. There might be. I 24 can look.</p>	<p>1 A. That is true, yeah. After that 2 import, I never accessed it again. I, I 3 knew. I, I knew that it was wrong to do 4 that. 5 Q. So you knew even accessing the emails 6 was wrong? 7 A. No. Other -- anything that I had 8 gotten after my termination, that it wasn't 9 my business. 10 Q. So you said that you never went into 11 your emails again after that one occasion; 12 is that correct? 13 A. I, I could have looked in that folder 14 for something. 15 Q. But at that point you would have had 16 the emails on your personal email, so why -- 17 A. I know. 18 Q. Right. 19 A. I know. 20 Q. So why would you have needed to look 21 at your Temple emails then? 22 A. But that was -- that happened 23 subsequent -- I mean simultaneously. I 24 mean, I went up, I met with the Help Desk, I</p>
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<p>1 Q. Do you know how he would have gotten 2 your personal phone number? 3 A. Because we were working on a project 4 together. 5 Q. So he had your personal phone number? 6 A. He did. It wasn't unusual in our 7 department for events. 8 Q. So is -- I just want to be clear. 9 Is it your testimony that you did not 10 open any email that you received subsequent 11 to the end of your employment from Temple 12 after the end of your employment with 13 Temple? 14 A. I don't -- no, I didn't. It might 15 have been from my kid, one of my kids 16 personally, but no. 17 Q. So other than email from your 18 children that was sent to your Temple 19 email -- 20 A. Right. 21 Q. -- it is your testimony that you 22 didn't open, delete, or do any other 23 activity on your Temple email after your 24 employment ended with Temple?</p>	<p>1 said, "How do I import these into mine?" No 2 one said to me, "Don't do it." I -- 3 Q. Well, did you tell anyone you were a 4 former employee? 5 A. No. But -- I didn't, but I think 6 it's still -- I think even if I were still 7 working there you -- I wouldn't take 8 anybody's email. 9 Q. So you understood -- and correct me 10 if I'm wrong, but you understood it was 11 wrong to access your Temple emails after 12 your employment with Temple ended; is that 13 correct? 14 A. Yes. 15 Q. And you -- let me strike that 16 question. 17 A. I'm not sure I understand anyway. 18 --- 19 (Whereupon, 6/23/05 PDP, Bates 20 No. TEMPLE UNIVERSITY 21 (R.BRIGGS)-0000224-234, was marked 22 as D Exhibit No. 19 for 23 identification.) 24 ---</p>

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<p>1 BY MS. FENDELL-SATINSKY: 2 Q. Ms. Briggs, take a look at this 3 document. My first question for you -- 4 A. Uh-huh. 5 Q. -- is going to be if you've seen this 6 before. 7 A. Yes. 8 Q. And is this your 20 -- 2004 to 2005 9 performance review? 10 A. Correct. 11 Q. Created by Allen Nicholson? 12 A. Correct. 13 Q. And your final rating on this review 14 was a 2.83, correct? 15 A. Correct. 16 Q. It's on the first page. 17 A. I said "yes." 18 Q. I didn't hear you. 19 A. Oh, okay. I'm sorry. 20 Q. So "yes"? 21 A. I'm sorry. "Yes." 22 Q. Just so it's clear for the record -- 23 A. Okay, sorry. 24 Q. -- your final rating on this</p>	<p>1 Q. Again, my first question for you is 2 going to be whether you've ever seen this 3 before. 4 A. Yes, I have. 5 Q. And is this your 2005 to 2006 6 performance review? 7 A. That's correct. 8 Q. And this was from Dean -- 9 A. Sadeghipour. 10 Q. -- Sadeghipour. 11 A. Uh-huh. 12 Q. And it's on the second page here, but 13 your final rating on this review was a 2.28, 14 correct? 15 A. Yes, correct. 16 Q. And if you look right below that, the 17 performance category ratings go from 0 to 4, 18 correct? 19 A. That's correct. 20 Q. And 4 is the highest rating? 21 A. That's correct. 22 Q. And 0 is the lowest rating -- 23 A. That is correct. 24 Q. -- correct?</p>
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<p>1 evaluation was 2.83, correct? 2 A. Yes. 3 I don't know why Dr. Wu's name is on 4 there, though. 5 MR. MUNSHI: Just wait for the 6 question. 7 THE WITNESS: Okay. 8 MS. FENDELL-SATINSKY: I'll 9 tell you I think that's because they 10 all update with the person's -- 11 THE WITNESS: Oh, okay. 12 MS. FENDELL-SATINSKY: -- last 13 supervisor. 14 --- 15 (Whereupon, 11/15/05 PDP, 16 Bates No. TEMPLE UNIVERSITY 17 (R.BRIGGS)-0000235-242, was marked 18 as D Exhibit No. 20 for 19 identification.) 20 --- 21 BY MS. FENDELL-SATINSKY: 22 Q. I've given you a document that's been 23 marked as D-20. 24 A. Uh-huh.</p>	<p>1 A. Yes. 2 --- 3 (Whereupon, 8/17/06 PDP, Bates 4 No. TEMPLE UNIVERSITY 5 (R.BRIGGS)-0000243-251, was marked 6 as D Exhibit No. 21 for 7 identification.) 8 --- 9 BY MS. FENDELL-SATINSKY: 10 Q. Ms. Briggs, the court reporter has 11 given you a -- 12 A. I'm sorry. 13 Q. -- document that's -- 14 A. I'm sorry. 15 Q. -- marked as D-21. 16 A. Uh-huh. 17 Q. And I have the same question for you, 18 which is if you've ever seen this document 19 before. 20 A. Yes, I have. 21 Q. And is this your 2006 to 2007 22 performance review? 23 A. That is. 24 Q. And that was created by</p>

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<p>1 George Palladino?</p> <p>2 A. That's correct.</p> <p>3 Q. And your final rating on this review</p> <p>4 was a 2.09, correct?</p> <p>5 A. That is correct.</p> <p>6 ---</p> <p>7 (Whereupon, 2/25/08 PDP, Bates</p> <p>8 No. TEMPLE UNIVERSITY</p> <p>9 (R.BRIGGS)-0000252-258, was marked</p> <p>10 as D Exhibit No. 22 for</p> <p>11 identification.)</p> <p>12 ---</p> <p>13 BY MS. FENDELL-SATINSKY:</p> <p>14 Q. Ms. Briggs, the court reporter has</p> <p>15 given you a document that we've marked as</p> <p>16 D-22. Again, I'm going to have the same</p> <p>17 first question, which is whether you've ever</p> <p>18 seen this document before.</p> <p>19 A. Yes, I have.</p> <p>20 Q. And this is an evaluation from 2007</p> <p>21 to 2008, correct?</p> <p>22 A. Correct.</p> <p>23 Q. Created by George Palladino --</p> <p>24 A. Correct.</p>	<p>1 comment" on some of the pages? Not on the</p> <p>2 first page.</p> <p>3 A. All right, okay, yes.</p> <p>4 Q. But on the second, for example?</p> <p>5 A. Yes, I see.</p> <p>6 Q. Are those your comments?</p> <p>7 A. Yes, they are.</p> <p>8 Q. So on the reviews where it says</p> <p>9 "employee comment," those are your comments</p> <p>10 that you put in, correct?</p> <p>11 A. Yes.</p> <p>12 ---</p> <p>13 (Whereupon, 10/01/08 PDP,</p> <p>14 Bates No. TEMPLE UNIVERSITY</p> <p>15 (R.BRIGGS)-0000259-264, was marked</p> <p>16 as D Exhibit No. 23 for</p> <p>17 identification.)</p> <p>18 ---</p> <p>19 BY MS. FENDELL-SATINSKY:</p> <p>20 Q. Ms. Briggs, the court reporter has</p> <p>21 given you a document that's been marked as</p> <p>22 D-23.</p> <p>23 A. Uh-huh, yes.</p> <p>24 Q. Is that a "yes"?</p>
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<p>1 Q. -- correct?</p> <p>2 A. Yes.</p> <p>3 Q. And if you look on the next page,</p> <p>4 your final rating on this review was a 2.7,</p> <p>5 correct?</p> <p>6 A. Yes.</p> <p>7 Q. Where it says "employee comments,"</p> <p>8 are those your comments that you drafted on</p> <p>9 the first page?</p> <p>10 A. They're mine, yes.</p> <p>11 Q. And if you go back to D-20, which is</p> <p>12 the 2005 --</p> <p>13 A. Okay.</p> <p>14 Q. -- to 2006 review.</p> <p>15 A. Uh-huh.</p> <p>16 Q. Where it says "employee comments,"</p> <p>17 are those your comments?</p> <p>18 A. Yes.</p> <p>19 Q. And if you go to D-21, which was the</p> <p>20 2006 to 2007 review.</p> <p>21 A. Uh-huh.</p> <p>22 Q. Is that a "yes"?</p> <p>23 A. Yes. I'm sorry.</p> <p>24 Q. You'll see that it says "employee</p>	<p>1 A. Yes.</p> <p>2 Q. Is -- have you seen this document</p> <p>3 before?</p> <p>4 A. Yes, I have.</p> <p>5 Q. Is this your 2008 to 2009 performance</p> <p>6 review?</p> <p>7 A. Yes.</p> <p>8 Q. And was this completed by George</p> <p>9 Palladino?</p> <p>10 A. Yes.</p> <p>11 Q. And your final rating on this review</p> <p>12 was a 2.88, correct?</p> <p>13 A. Yes.</p> <p>14 ---</p> <p>15 (Whereupon, 6/14/11 PDP, Bates</p> <p>16 No. TEMPLE UNIVERSITY</p> <p>17 (R.BRIGGS)-0000265-270, was marked</p> <p>18 as D Exhibit No. 24 for</p> <p>19 identification.)</p> <p>20 ---</p> <p>21 BY MS. FENDELL-SATINSKY:</p> <p>22 Q. Ms. Briggs, the court reporter has</p> <p>23 given you a document marked as D-24.</p> <p>24 Have you seen this document before?</p>

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<p>1 A. Yes.</p> <p>2 Q. Is this your 2010 to 2011 performance</p> <p>3 review?</p> <p>4 A. Yes.</p> <p>5 Q. And was this created by Dr. Wu?</p> <p>6 A. Yes.</p> <p>7 Q. And on this review your final rating</p> <p>8 was a 2.91, correct?</p> <p>9 A. Yes.</p> <p>10 Q. And that was higher than the rating</p> <p>11 you received in year 2008 to 2009 review</p> <p>12 from George Palladino --</p> <p>13 A. Yes.</p> <p>14 Q. -- correct?</p> <p>15 A. Yes.</p> <p>16 ---</p> <p>17 (Whereupon, 6/12/12 PDP, Bates</p> <p>18 No. TEMPLE0137-142, was marked as D</p> <p>19 Exhibit No. 25 for identification.)</p> <p>20 ---</p> <p>21 BY MS. FENDELL-SATINSKY:</p> <p>22 Q. Ms. Briggs, the court reporter has</p> <p>23 given you a document that's been marked as</p> <p>24 D-25.</p>	<p>1 A. Yes.</p> <p>2 Q. And this is your review from Dr. Wu,</p> <p>3 correct?</p> <p>4 A. Yes.</p> <p>5 Q. And the format on this review is a</p> <p>6 little bit different?</p> <p>7 A. That's correct.</p> <p>8 Q. Your final rating on this review was</p> <p>9 "partially meets expectations," correct?</p> <p>10 A. Yes.</p> <p>11 Q. And if you look down at "Performance</p> <p>12 Rating Categories," the top category is</p> <p>13 "exceeds expectations," right?</p> <p>14 A. Where is that? What page?</p> <p>15 Q. The bottom of the first page.</p> <p>16 A. It's cut off of mine.</p> <p>17 Q. So performance category ratings, the</p> <p>18 top category is "significantly exceeds</p> <p>19 expectations," correct?</p> <p>20 A. Oh, I see it, okay.</p> <p>21 Q. Is it right that the first/top</p> <p>22 category is "significantly exceeds</p> <p>23 expectations"?</p> <p>24 A. I'm sorry? Repeat.</p>
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<p>1 A. Uh-huh, yes.</p> <p>2 Q. Have you seen this document before?</p> <p>3 A. Yes.</p> <p>4 Q. And is this your 2011 to 2012</p> <p>5 performance review?</p> <p>6 A. Yes.</p> <p>7 Q. And this review is from Dr. Wu,</p> <p>8 correct?</p> <p>9 A. Yes.</p> <p>10 Q. And your final rating on this review</p> <p>11 is a 2.78, correct?</p> <p>12 A. Yes.</p> <p>13 ---</p> <p>14 (Whereupon, 5/28/13 PDP, Bates</p> <p>15 No. TEMPLE0143-146, was marked as D</p> <p>16 Exhibit No. 26 for identification.)</p> <p>17 ---</p> <p>18 BY MS. FENDELL-SATINSKY:</p> <p>19 Q. Ms. Briggs, the court reporter has</p> <p>20 given you a document marked as D-26.</p> <p>21 Have you seen this document before?</p> <p>22 A. Yes.</p> <p>23 Q. And is this your 2012 to 2013</p> <p>24 performance review?</p>	<p>1 Q. Sure.</p> <p>2 MR. MUNSHI: Do you want me to</p> <p>3 just show her?</p> <p>4 BY MS. FENDELL-SATINSKY:</p> <p>5 Q. Am I -- on the bottom of the page --</p> <p>6 A. Uh-huh.</p> <p>7 Q. -- the first page, it says</p> <p>8 "Performance Rating Categories."</p> <p>9 Do you see that?</p> <p>10 A. Right, yeah.</p> <p>11 Q. Okay. So under "Performance Rating</p> <p>12 Categories," it indicates a top ranking is</p> <p>13 "significantly exceeds expectations,"</p> <p>14 correct?</p> <p>15 A. Yes.</p> <p>16 Q. And then "exceeds expectations" is</p> <p>17 below that, right?</p> <p>18 A. Yes.</p> <p>19 Q. "Meets expectations" is below that,</p> <p>20 correct?</p> <p>21 A. Yes.</p> <p>22 Q. Then if you turn to the next page,</p> <p>23 "partially meets expectations" is below</p> <p>24 that, correct?</p>

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<p>1 A. Yes.</p> <p>2 Q. And then "does not meet expectations"</p> <p>3 is below that?</p> <p>4 A. Yes.</p> <p>5 Q. At any time did you tell Dr. Wu you</p> <p>6 believed you were being treated differently</p> <p>7 because of your sex?</p> <p>8 A. No.</p> <p>9 Q. At any time did you tell Dr. Wu you</p> <p>10 believed you were being treated differently</p> <p>11 because of your age?</p> <p>12 A. No.</p> <p>13 Q. At any time did you tell Dr. Wu that</p> <p>14 you thought you experienced a hostile work</p> <p>15 environment from him?</p> <p>16 A. Yes. Yes, I did.</p> <p>17 Q. When did you tell him that?</p> <p>18 A. I don't have a date. I mean, it was</p> <p>19 around when Drew and Dr. Wu and I were</p> <p>20 meeting.</p> <p>21 Q. Did you tell him that you believed</p> <p>22 you were experiencing a hostile work</p> <p>23 environment because of your age?</p> <p>24 A. No, I did not.</p>	<p>1 Q. Earlier you identified some employees</p> <p>2 that you felt Dr. Wu protected.</p> <p>3 A. Uh-huh.</p> <p>4 Q. Do you recall that?</p> <p>5 A. Yes, I do.</p> <p>6 Q. And one of those employees you</p> <p>7 referred to is Hailey King, correct?</p> <p>8 A. Yes.</p> <p>9 Q. And you told me there was an instance</p> <p>10 in which Hailey King did not report to work</p> <p>11 for three days and was not disciplined --</p> <p>12 A. Yes.</p> <p>13 Q. -- is that correct?</p> <p>14 How do you know Ms. King was not</p> <p>15 disciplined?</p> <p>16 A. Because her office was right next to</p> <p>17 mine and she didn't show up. We were -- we</p> <p>18 were concerned, where is she. We called,</p> <p>19 tried to call her, couldn't get her.</p> <p>20 Q. My question was: How do you know</p> <p>21 that Ms. King was not disciplined?</p> <p>22 A. Because she didn't show up for work.</p> <p>23 Q. How do you know she was not</p> <p>24 disciplined?</p>
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<p>1 Q. Did you tell him you believed you</p> <p>2 were experiencing a hostile work environment</p> <p>3 because of your sex?</p> <p>4 A. No.</p> <p>5 Q. At any time, did you tell Dr. Wu you</p> <p>6 believed you were being retaliated against?</p> <p>7 A. Yes.</p> <p>8 Q. And when did you tell Dr. Wu that?</p> <p>9 A. Around that same time. I can't tell</p> <p>10 you exactly what date.</p> <p>11 Q. Did you tell Dr. Wu why you believed</p> <p>12 you were being retaliated against?</p> <p>13 A. No, I did not.</p> <p>14 Q. So you just generally told him you</p> <p>15 believed he was retaliating against you?</p> <p>16 A. Yes. And I remember asking him if</p> <p>17 there was something that -- "What was it?"</p> <p>18 "What could I change?"</p> <p>19 Q. And what did he say?</p> <p>20 A. To do as I'm told to do, pretty much.</p> <p>21 Q. And just so that I'm clear, you did</p> <p>22 not tell him why you believed he was</p> <p>23 retaliating against you?</p> <p>24 A. No, I did not tell him, uh-uh.</p>	<p>1 A. Because I was told. It's in one of</p> <p>2 the emails. I mean, she -- I can't, I can't</p> <p>3 remember why, how I know, but I know that</p> <p>4 she wasn't.</p> <p>5 Q. Do you know if Dr. Wu or anyone else</p> <p>6 had a conversation with her about it?</p> <p>7 A. I think that they did speak to her,</p> <p>8 yes.</p> <p>9 Q. And after that incident, was there</p> <p>10 any other occasion on which Ms. King did not</p> <p>11 report to work?</p> <p>12 A. There was another incident where she</p> <p>13 didn't report for two days. I did not know</p> <p>14 about that. The timekeeper told me because</p> <p>15 she was very upset about what was going on,</p> <p>16 and she actually resigned as a result.</p> <p>17 Q. Who was the timekeeper?</p> <p>18 A. Antoinette Newton.</p> <p>19 Q. Was Ms. King a union employee?</p> <p>20 A. I don't know that.</p> <p>21 Q. Why did Ms. King have to keep her</p> <p>22 time if she was not a union employee?</p> <p>23 A. Well, Toni kept a time for everyone</p> <p>24 in the department. It wasn't like a time</p>

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<p>1 clock. She just...</p> <p>2 Q. Do you know why Ms. King was absent</p> <p>3 those two days?</p> <p>4 A. No, I don't.</p> <p>5 Q. Do you know if Ms. King had an</p> <p>6 emergency?</p> <p>7 A. I don't.</p> <p>8 Q. Do you know if Ms. King had any FMLA</p> <p>9 leave?</p> <p>10 A. No.</p> <p>11 Q. Do you know if Ms. King had any</p> <p>12 medical accommodation?</p> <p>13 A. No, I don't know that.</p> <p>14 Q. Do you know if Ms. King was</p> <p>15 disciplined for the time that she did not</p> <p>16 report for two days?</p> <p>17 A. I don't know that.</p> <p>18 ---</p> <p>19 (Whereupon, 12/14/11 email,</p> <p>20 Bates No. TEMPLE UNIVERSITY</p> <p>21 (R.BRIGGS)-0000327-328, was marked</p> <p>22 as D Exhibit No. 27 for</p> <p>23 identification.)</p> <p>24 ---</p>	<p>1 think she came right from graduate school.</p> <p>2 I'm not sure about her work experience.</p> <p>3 Q. Do you know what her graduate degree</p> <p>4 was in?</p> <p>5 A. I think it was in student counseling.</p> <p>6 I'm not sure, but it was in counseling, the</p> <p>7 counseling field.</p> <p>8 Q. Any other way in which you believe</p> <p>9 Ms. King was treated better than you by</p> <p>10 Dr. Wu?</p> <p>11 A. She came -- she was pretty much late</p> <p>12 just about a couple times a week because of</p> <p>13 the train, and left early. And that is --</p> <p>14 no one ever said anything. And I wouldn't</p> <p>15 either, except for I was the one who was</p> <p>16 expected to stay.</p> <p>17 I'm sorry. Never mind. No, I don't</p> <p>18 know that.</p> <p>19 Q. You worked, you said, on the tenth</p> <p>20 floor, correct?</p> <p>21 A. I'm sorry?</p> <p>22 Q. You told me you worked on the tenth</p> <p>23 floor?</p> <p>24 A. Yes.</p>
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<p>1 BY MS. FENDELL-SATINSKY:</p> <p>2 Q. Before we look at this email, let me</p> <p>3 ask you one other question about Ms. King.</p> <p>4 Was there any other way other than</p> <p>5 what you've already testified to that you</p> <p>6 believe that Ms. King was treated better</p> <p>7 than you by Dr. Wu?</p> <p>8 A. Well, once I was moved upstairs, uhm,</p> <p>9 a lot of my responsibilities were given to</p> <p>10 her. Things that I had done for years like</p> <p>11 the awards banquet, some stuff with events</p> <p>12 was given to her when I had done them</p> <p>13 successfully for years.</p> <p>14 Q. Do you know why they were given to</p> <p>15 her?</p> <p>16 A. No, I don't.</p> <p>17 Q. Did you ask why?</p> <p>18 A. No, I did not.</p> <p>19 Q. When did Ms. King join Temple?</p> <p>20 A. I'm, I'm going to guess it's 2012. I</p> <p>21 can't say for certain.</p> <p>22 Q. Do you know what kind of experience</p> <p>23 Ms. King had before working at Temple?</p> <p>24 A. Her work experience, I don't. I</p>	<p>1 Q. And did Ms. King also work on the</p> <p>2 tenth floor?</p> <p>3 A. No. She remained in the main office.</p> <p>4 I was moved after she came.</p> <p>5 Q. So you did not work in the same</p> <p>6 physical --</p> <p>7 A. No.</p> <p>8 Q. -- space as her?</p> <p>9 A. We did for a while. We did for a</p> <p>10 while, about a year.</p> <p>11 Q. Until you were moved?</p> <p>12 A. Yes.</p> <p>13 Q. And after you were moved, you were</p> <p>14 not in the same space as Ms. King, correct?</p> <p>15 A. No, I was not.</p> <p>16 Q. And so you couldn't observe what she</p> <p>17 was doing on a daily basis, correct?</p> <p>18 A. No; except for when she needed stuff</p> <p>19 from me. I mean --</p> <p>20 Q. Correct.</p> <p>21 A. -- we did talk about stuff.</p> <p>22 Q. But because you were not in the same</p> <p>23 physical office as her --</p> <p>24 A. That is --</p>

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<p style="text-align: right;">Page 365</p> <p>1 Q. -- once you moved to the tenth floor, 2 you could not see if she was coming late or 3 leaving early, correct? 4 A. No, correct. 5 Q. And do you know what Ms. King's 6 salary was? 7 A. No. I have -- don't. 8 Q. Do you know if Ms. King was paid more 9 than you or less than you? 10 A. I don't know. 11 Q. Do you know what Ms. King's job 12 description was? 13 A. No, I don't know what her job 14 description was. 15 Q. Did you ever review Ms. King's job 16 description? 17 A. No. 18 Q. Did you -- strike that. 19 Ms. King is also a woman, correct? 20 A. Yes. 21 Q. Any other way in which you believe 22 Ms. King was treated better than you by 23 Dr. Wu? 24 A. No.</p>	<p style="text-align: right;">Page 367</p> <p>1 A. Yes, I do. 2 Q. Did you ever violate policies about 3 student records or Social Security numbers? 4 A. I didn't, no. 5 Q. Were you disciplined for any 6 violations other than those that we reviewed 7 today? 8 A. The, the -- 9 Q. So today we reviewed some 10 disciplinary actions, correct? 11 A. Yes. 12 Q. Did you receive any disciplinary 13 actions other than the disciplinary actions 14 we reviewed today? 15 A. No. 16 --- 17 (Whereupon, Plaintiff's 18 complaint was marked as D Exhibit 19 No. 28 for identification.) 20 --- 21 BY MS. FENDELL-SATINSKY: 22 Q. Ms. Briggs, have you seen this 23 document before? 24 A. Yes, I have.</p>
<p style="text-align: right;">Page 366</p> <p>1 Q. So, I believe the court reporter gave 2 you a document marked as D-27. 3 A. Uh-huh. 4 Q. I have you seen this email before? 5 A. Uh-huh. 6 Q. Is that a "yes"? 7 A. Yes. I'm sorry. "Yes." 8 Q. And is this an email from you to 9 Mr. Wacker and Mr. DiMeo? 10 A. Yes. 11 Q. And have you seen this document 12 before? I think you just said "yes." 13 A. Yes. 14 Q. If you go down to the third to last 15 paragraph. 16 A. Uh-huh. 17 Q. You write, "I am wondering how it is 18 that I can be disciplined for violations and 19 others in the office come and go as they 20 please, violate policies about student 21 records and Social Security numbers, with no 22 consequences at all." 23 A. Uh-huh. 24 Q. Do you see that?</p>	<p style="text-align: right;">Page 368</p> <p>1 Q. And is this the Complaint that you 2 filed against Temple? 3 A. Yes. 4 Q. Did you read this Complaint before it 5 was filed? 6 A. Yes. 7 Q. And when you read it, did you believe 8 that all of the facts in it were true? 9 A. Yes. 10 Q. I want you to turn to paragraph 35. 11 It's on Page 5. 12 A. Okay. 13 Q. And you reference in that paragraph 14 that you continued to be harassed and 15 bullied by Dr. Wu. 16 Do you contend that there's any 17 harassment or bullying that you received 18 from Dr. Wu other than what you've already 19 testified to today? 20 A. No. 21 Q. I want you to turn to paragraph 46, 22 please. It's on Page 6. 23 A. Okay. 24 Q. You reference in that paragraph that</p>

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<p>1 you felt singled out by Dr. Wu and Andrew 2 DiMeo. 3 Do you see that? 4 A. I see that. 5 Q. Did you felt -- did you feel singled 6 out by Dr. Wu and Andrew DiMeo in any way 7 other than what we've already -- what -- I'm 8 sorry. Let me go back so it's clean. 9 Did you feel singled out in any way 10 by Dr. Wu and Andrew DiMeo other than what 11 you've already testified to today? 12 A. No. 13 Q. Earlier you mentioned that you took 14 FMLA leave during your employment at Temple? 15 A. That is correct. 16 Q. And were there -- did you have any 17 issues related to your Family Medical Leave 18 Act leave? 19 MR. MUNSHI: Just objection to 20 form. 21 MS. FENDELL-SATINSKY: Sure. 22 MR. MUNSHI: On "issues." 23 MS. FENDELL-SATINSKY: Sure. 24</p>	<p>1 Back on the record. 2 BY MS. FENDELL-SATINSKY: 3 Q. Ms. Briggs, earlier you told me that 4 you believed Deirdre Walton, in addition to 5 other people, retaliated against you; is 6 that correct? 7 A. Yes. 8 Q. And you also testified that Deirdre 9 Walton lifted the ban on your applications, 10 internal applications; is that correct? 11 A. Yes. 12 Q. And am I correct that when somebody 13 is on probation at Temple, the policy is 14 that person can't post internally for a job 15 until the probation is up? Is that right? 16 A. Yes. 17 Q. And Ms. Walton lifted that ban for 18 you so that you could apply for other 19 positions while you were on probation? 20 A. Yes. She said she did, uh-huh. 21 Q. And did you understand that she did 22 that? 23 A. I understood she did it. 24 Q. And that's not something she had to</p>
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<p>1 BY MS. FENDELL-SATINSKY: 2 Q. Did you have any -- did Temple 3 approve your request for FMLA leave? 4 A. Yes. 5 Q. And did you take absences as part of 6 your FMLA leave? 7 A. Yes, I did. 8 Q. And did you have any -- did you 9 receive any discipline or criticism from 10 anyone at Temple for taking your FMLA leave? 11 A. No. 12 MS. FENDELL-SATINSKY: I think 13 now is a good time for a quick 14 break. 15 MR. MUNSHI: Okay. 16 THE VIDEOGRAPHER: The time is 17 4:29. 18 Off the record. 19 --- 20 (Whereupon, a brief recess was 21 taken from 4:29 until 4:40 p.m.) 22 --- 23 THE VIDEOGRAPHER: The time is 24 4:40.</p>	<p>1 do, correct? 2 A. No, I guess not. I don't know for 3 sure, but, yeah. 4 Q. And -- 5 A. I would say "no." 6 Q. And you appreciated she did that? 7 A. I appreciated it. 8 Q. And you still believe that she 9 retaliated against you. 10 In what way did she retaliate against 11 you? 12 A. I reached out to her on numerous 13 occasions - and I believe you have those 14 emails - to please come and help me, just 15 help me mediate. 16 Q. And so you believe that Ms. Walton 17 retaliated against you by not mediating? 18 A. Well, well, by when I would call her 19 and ask her to come, she would say, "Let me 20 talk to Greg." Or if it had to do with a 21 discipline, when I told her about the 22 three-day discipline for coming in three 23 hours late, she thought it was harsh and she 24 said, "Well, let me call Greg."</p>

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<p>1 And then when she called back, she</p> <p>2 said, "Well, you failed to follow protocol."</p> <p>3 And then it was all of a sudden it changed,</p> <p>4 so I -- but I continued to reach out to her.</p> <p>5 I reached out to her first always.</p> <p>6 Q. Was that because she was your H.R.</p> <p>7 contact?</p> <p>8 A. Yes. And she was Labor Relations.</p> <p>9 Q. Is there any other way in which you</p> <p>10 believe that Ms. Walton retaliated against</p> <p>11 you?</p> <p>12 A. By refusing to meet. She met with me</p> <p>13 once.</p> <p>14 Q. Did she respond to your emails?</p> <p>15 A. One time. That was about that she</p> <p>16 would lift the ban for me.</p> <p>17 Q. So your testimony is that Ms.</p> <p>18 Walton --</p> <p>19 A. Well, no. I take it back. She, she</p> <p>20 did respond to my emails that I said,</p> <p>21 "You're not responding" in a defensive way.</p> <p>22 Q. Any other way in which you believe</p> <p>23 Ms. Walton retaliated against you?</p> <p>24 A. Well, I told her that I wanted to</p>	<p>1 did, I guess.</p> <p>2 Q. So you understood that nonunion</p> <p>3 employees do not have an opportunity to</p> <p>4 respond to discipline?</p> <p>5 A. Oh, to -- I'm sorry.</p> <p>6 Q. Let me ask the question --</p> <p>7 A. Okay.</p> <p>8 Q. -- differently.</p> <p>9 A. Okay.</p> <p>10 Q. Did you understand that nonunion</p> <p>11 employees could not give statements with</p> <p>12 regard to their discipline or as part of</p> <p>13 their discipline?</p> <p>14 A. Really? No, I didn't.</p> <p>15 Q. Anything else that you believe</p> <p>16 Mr. Wacker did to retaliate against you?</p> <p>17 A. No.</p> <p>18 Q. Why do you believe that Ms. Walton</p> <p>19 retaliated against you?</p> <p>20 A. I believe she believed Greg. Greg</p> <p>21 talked to her. She said she got, you know,</p> <p>22 the particulars from Greg, and that's --</p> <p>23 then wouldn't explain it to me.</p> <p>24 Q. Any other reason you believe that</p>
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<p>1 meet with Sandy Foehl, the Equal Employment</p> <p>2 internal officer. She knew that.</p> <p>3 Q. And did you tell her why you wanted</p> <p>4 to meet with Sandy?</p> <p>5 A. No, I didn't.</p> <p>6 Q. Any other way in which you believe</p> <p>7 Ms. Walton retaliated against you?</p> <p>8 A. No.</p> <p>9 Q. You also testified that you believe</p> <p>10 Mr. Wacker retaliated against you; is that</p> <p>11 correct?</p> <p>12 A. Yes.</p> <p>13 Q. In what way do you believe Mr. Wacker</p> <p>14 retaliated against you?</p> <p>15 A. By putting through all of these</p> <p>16 things against me without having been there,</p> <p>17 without even allowing me to give my, my</p> <p>18 version of what happened. He said it wasn't</p> <p>19 necessary. My boss told him, told him, and</p> <p>20 that was enough.</p> <p>21 Q. Did you understand that nonunion</p> <p>22 employees do not have an opportunity to</p> <p>23 respond to discipline?</p> <p>24 A. I know that I'm at-will. Yes, yes, I</p>	<p>1 Ms. Walton retaliated against you?</p> <p>2 A. No.</p> <p>3 Q. Why do you believe Mr. Wacker</p> <p>4 retaliated against you?</p> <p>5 A. I don't know the answer to that</p> <p>6 question.</p> <p>7 Q. You also --</p> <p>8 A. I'm sorry.</p> <p>9 Q. I'm sorry. Did I cut you off?</p> <p>10 A. I'm sorry. I just don't know the</p> <p>11 answer.</p> <p>12 Q. So you don't have a belief as to why</p> <p>13 he retaliated against you; is that correct?</p> <p>14 A. No.</p> <p>15 Q. You also testified that you believe</p> <p>16 Dr. Wu retaliated against you.</p> <p>17 How do you believe Dr. Wu retaliated</p> <p>18 against you?</p> <p>19 A. For contacting H.R.</p> <p>20 Q. For contacting Deirdre?</p> <p>21 A. On several occasions. Contacting</p> <p>22 Sandy Foehl.</p> <p>23 Q. How do you know that Dr. Wu knew you</p> <p>24 contacted Deirdre?</p>

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<p>1 A. Because Greg told him.</p> <p>2 Q. Greg?</p> <p>3 A. Deirdre would contact Greg.</p> <p>4 Q. And you believe Greg then told</p> <p>5 Dr. Wu?</p> <p>6 A. Greg did tell, I know, yes.</p> <p>7 Q. How do you know that Greg told Dr. Wu</p> <p>8 that you spoke to Deirdre?</p> <p>9 A. It's hearsay, but Drew said, "Well,</p> <p>10 Dr. Wu knows what you're doing. He knows</p> <p>11 about this."</p> <p>12 Q. He knows about what?</p> <p>13 A. About my going to Sandy Foehl, going</p> <p>14 to Deirdre, trying to work this out. And I</p> <p>15 did -- at one time I did say to him, "Dr.</p> <p>16 Wu, I think we need a mediator. I think</p> <p>17 we're speaking different languages."</p> <p>18 Q. At any point -- let me ask something</p> <p>19 else.</p> <p>20 Do you have any firsthand knowledge</p> <p>21 that Dr. Wu knew that you spoke with Deirdre</p> <p>22 or Sandy?</p> <p>23 A. Repeat the question, please.</p> <p>24 Q. Sure.</p>	<p>1 tired of Wu being over here all the time.</p> <p>2 Just do what he says."</p> <p>3 Q. Right. And you said that Greg Wacker</p> <p>4 told you to cut it out.</p> <p>5 I'm asking did he tell you what to</p> <p>6 "cut it out"?</p> <p>7 A. Just do what Dr. -- cut out</p> <p>8 questioning this. Like if I would question,</p> <p>9 like repeat instructions, that was seen as</p> <p>10 being confrontational. And I wasn't. It</p> <p>11 was like, "I don't understand. Could you</p> <p>12 repeat it."</p> <p>13 Q. Did Greg Wacker ever tell you that he</p> <p>14 told Dr. Wu that you spoke with Deirdre or</p> <p>15 Sandy?</p> <p>16 A. No. It would have been secondhand.</p> <p>17 No.</p> <p>18 Q. Did anyone, did anyone other than</p> <p>19 Drew DiMeo tell you that they told Dr. Wu</p> <p>20 that you spoke with Deirdre or Sandy?</p> <p>21 A. No.</p> <p>22 Q. So the only person who told you that</p> <p>23 they told Dr. Wu you spoke with Deirdre and</p> <p>24 Sandy was Drew DiMeo; is that correct?</p>
Page 378	Page 380
<p>1 Do you have any firsthand knowledge,</p> <p>2 personal knowledge, that Dr. Wu knew that</p> <p>3 you spoke with Deirdre or Sandy?</p> <p>4 A. No. Only through other people. No.</p> <p>5 Q. And the other people you heard that</p> <p>6 through you said was Drew DiMeo?</p> <p>7 A. Uh-huh.</p> <p>8 Q. Is that a "yes"?</p> <p>9 A. Yes. I'm sorry.</p> <p>10 Q. Anyone else?</p> <p>11 A. Greg Wacker.</p> <p>12 Q. Greg Wacker told you that Dr. Wu knew</p> <p>13 you contacted Deirdre and Sandy?</p> <p>14 A. Yeah.</p> <p>15 Q. In what context did he tell you that?</p> <p>16 A. It was probably -- it was he would</p> <p>17 call me over to his office and tell me. He</p> <p>18 would say it, threaten me, you know, "You</p> <p>19 got" -- "If you want your job, you need to,</p> <p>20 you need to cut it out."</p> <p>21 Q. Did he say what you needed to cut</p> <p>22 out, or did you imply it?</p> <p>23 A. Well, it was about Dr. Wu. He knew</p> <p>24 that because he was angry. He's like, "I'm</p>	<p>1 A. Right.</p> <p>2 Q. Did you tell Drew DiMeo -- is that</p> <p>3 correct?</p> <p>4 A. Yes, uh-huh.</p> <p>5 Q. Did you tell Dr. DiMeo that you spoke</p> <p>6 with Sandy?</p> <p>7 A. I told him. Yes, I did.</p> <p>8 Q. Why did you tell him that?</p> <p>9 A. Because of his comments about my</p> <p>10 gender, my age and gender, and the very</p> <p>11 different treatment.</p> <p>12 Q. Because of whose comments about your</p> <p>13 age and gender?</p> <p>14 A. Dr. Wu. I'm sorry.</p> <p>15 Q. And those are the comments, the two</p> <p>16 comments you referred to earlier about</p> <p>17 Dr. Wu telling you that, that in China women</p> <p>18 were put out to pasture at a certain age --</p> <p>19 A. Uh-huh.</p> <p>20 Q. -- and that in China women retired at</p> <p>21 55, correct?</p> <p>22 A. Yes.</p> <p>23 Q. Did Mr. DiMeo make any comments about</p> <p>24 your gender?</p>

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<p>1 A. No.</p> <p>2 Q. Did Mr. DiMeo make any comments about</p> <p>3 your age?</p> <p>4 A. No.</p> <p>5 Q. Did Mr. Wacker make any comments</p> <p>6 about your gender?</p> <p>7 A. No.</p> <p>8 Q. Did Mr. Wacker make any comments</p> <p>9 about your age?</p> <p>10 A. No.</p> <p>11 Q. Did Ms. Walton make any comments</p> <p>12 about your age?</p> <p>13 A. No.</p> <p>14 Q. Did Ms. Walton make any comments</p> <p>15 about your gender?</p> <p>16 A. No.</p> <p>17 Q. Did Ms. Foehl make any comments about</p> <p>18 your age?</p> <p>19 A. No.</p> <p>20 Q. Did Ms. Foehl make any comments about</p> <p>21 your gender?</p> <p>22 A. No.</p> <p>23 Q. Other than what we've already talked</p> <p>24 about, is there any way in which -- any</p>	<p>1 Q. And on the bottom of 211, that's an</p> <p>2 email from you to Sandy Foehl on July 25th,</p> <p>3 2012, correct?</p> <p>4 A. Yes.</p> <p>5 Q. And this email says that you spoke</p> <p>6 with Rhonda Brown?</p> <p>7 A. Yes.</p> <p>8 Q. Who is Rhonda Brown?</p> <p>9 A. She was the, the director or chair of</p> <p>10 the -- I think they changed the name of the</p> <p>11 office. I think it was called -- I don't</p> <p>12 know. It was for Equal Opportunity. She</p> <p>13 worked with Sandy for a while. I don't know</p> <p>14 what they called it.</p> <p>15 Q. And Rhonda suggested that you reach</p> <p>16 out to Sandy?</p> <p>17 A. That's what she said, yes.</p> <p>18 Q. And this email on July 25th, 2012, is</p> <p>19 this the first time that you had spoken with</p> <p>20 anyone in EEO about -- let me just step</p> <p>21 back.</p> <p>22 Is this email from July 25th, 2012</p> <p>23 the first time you spoke with anyone in EEO</p> <p>24 during your employment at Temple?</p>
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<p>1 other way in which you believe Dr. Wu</p> <p>2 retaliated against you?</p> <p>3 A. No.</p> <p>4 ---</p> <p>5 (Whereupon, 8/2/12 email</p> <p>6 string regarding scheduling a</p> <p>7 meeting, Bates No. TEMPLE UNIVERSITY</p> <p>8 (R.BRIGGS)-0000210-212 and 2098, was</p> <p>9 marked as D Exhibit No. 29 for</p> <p>10 identification.)</p> <p>11 ---</p> <p>12 BY MS. FENDELL-SATINSKY:</p> <p>13 Q. Ms. Briggs, this document is marked</p> <p>14 as Exhibit D-29. The Bates numbers are 210,</p> <p>15 211, 212, and then 208 --</p> <p>16 A. Uh-huh.</p> <p>17 Q. -- is the last one.</p> <p>18 Do you see that?</p> <p>19 A. 208, yes.</p> <p>20 Q. Okay. Have you seen these emails</p> <p>21 before?</p> <p>22 A. Yes, I have.</p> <p>23 Q. So I want to start on 211, please.</p> <p>24 A. Okay.</p>	<p>1 A. She wasn't in EEO. Is that --</p> <p>2 Rhonda, you mean?</p> <p>3 Q. I'm talking about Sandy.</p> <p>4 A. Oh, Sandy. Uhm, yes, it was.</p> <p>5 Q. Okay.</p> <p>6 A. Uh-huh.</p> <p>7 Q. So July 25th, 2012 was the first time</p> <p>8 you spoke with anyone in EEO?</p> <p>9 A. Yes.</p> <p>10 Q. And you emailed Sandy on July 25th.</p> <p>11 Sandy wrote back to you on July 26th and</p> <p>12 said when -- what her availability was.</p> <p>13 Do you see that?</p> <p>14 A. I do.</p> <p>15 Q. And then on July 29th you wrote back</p> <p>16 to Sandy and you gave her your availability,</p> <p>17 correct?</p> <p>18 A. Which one? I'm sorry. Which one?</p> <p>19 Q. Sure. So if you go to --</p> <p>20 A. Which page?</p> <p>21 Q. -- the first page, 210.</p> <p>22 A. Uh-huh.</p> <p>23 Q. On July 29th, you emailed Sandy.</p> <p>24 A. Right.</p>

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<p style="text-align: right;">Page 385</p> <p>1 Q. Correct?</p> <p>2 A. Yes, I did.</p> <p>3 Q. And you said -- you gave her your</p> <p>4 availability to meet, correct?</p> <p>5 A. Yes.</p> <p>6 Q. And then Sandy suggested a time on</p> <p>7 July 30th --</p> <p>8 A. Yes.</p> <p>9 Q. -- correct? And then based on your</p> <p>10 email from August 2nd, 2012, it appears that</p> <p>11 you and Sandy had a meeting?</p> <p>12 A. That is true.</p> <p>13 Q. So do you recall on what day you met</p> <p>14 with Sandy?</p> <p>15 A. What day of the week it was?</p> <p>16 Q. So, your meeting with Sandy was</p> <p>17 obviously between July 30th and August 2nd,</p> <p>18 correct?</p> <p>19 A. I would, I would -- I do remember the</p> <p>20 meeting.</p> <p>21 Q. Okay. So what day was the meeting?</p> <p>22 A. What day of the -- I don't know what</p> <p>23 day the meeting was.</p> <p>24 Q. Okay. But you'll agree with me that</p>	<p style="text-align: right;">Page 387</p> <p>1 China women retire at 55?</p> <p>2 A. That is correct.</p> <p>3 Q. And those comments were not about</p> <p>4 you, correct?</p> <p>5 MR. MUNSHI: Just objection to</p> <p>6 form.</p> <p>7 BY MS. FENDELL-SATINSKY:</p> <p>8 Q. Were those comments about you?</p> <p>9 A. About me?</p> <p>10 Q. Yes.</p> <p>11 A. Oh, I don't know. I mean, no. He</p> <p>12 just said it to me.</p> <p>13 Q. Right.</p> <p>14 A. Okay.</p> <p>15 Q. He said it to you.</p> <p>16 A. To me, right, right.</p> <p>17 Q. But they weren't about you, correct?</p> <p>18 A. Not to my -- no, uh-uh.</p> <p>19 Q. You -- "no"?</p> <p>20 A. "No." I'm sorry.</p> <p>21 Q. That's okay.</p> <p>22 Anything else you discussed with</p> <p>23 Sandy during that meeting?</p> <p>24 A. She, you know, she just walked</p>
<p style="text-align: right;">Page 386</p> <p>1 your meeting with Sandy was sometime between</p> <p>2 July 30th and August 2nd, 2012?</p> <p>3 A. Well, it says that I met with her on</p> <p>4 July 30th.</p> <p>5 Q. Okay. So your meeting with Sandy was</p> <p>6 on July 30th, correct?</p> <p>7 A. That is correct. I'm sorry.</p> <p>8 Q. Where did you meet with Sandy?</p> <p>9 A. In her office.</p> <p>10 Q. How long did you meet with her for?</p> <p>11 A. Half an hour to forty-five minutes,</p> <p>12 maybe.</p> <p>13 Q. What did you discuss with her during</p> <p>14 that meeting?</p> <p>15 A. About the problems I was having in</p> <p>16 the department and that I -- the comments</p> <p>17 Dr. Wu had made about my age and my -- I, I</p> <p>18 just needed to talk to her, but I decided to</p> <p>19 withdraw.</p> <p>20 Q. And when you say the comments Dr. Wu</p> <p>21 made about age, are you referring to the</p> <p>22 comments that you testified to where Dr. Wu</p> <p>23 said that in China women are put out to</p> <p>24 pasture around a certain age and that in</p>	<p style="text-align: right;">Page 388</p> <p>1 through the process with me. And I asked</p> <p>2 her to hold off on it, because I have a son</p> <p>3 with a spinal cord injury. He was having</p> <p>4 surgery, and I was concerned about that; so</p> <p>5 I asked her to just hold on, don't release</p> <p>6 anything.</p> <p>7 Q. So if you turn to the last page,</p> <p>8 which is 208.</p> <p>9 A. (Witness complies with request.)</p> <p>10 Q. This is an August 3rd email from</p> <p>11 Sandy to you, correct?</p> <p>12 A. Yes, it is.</p> <p>13 Q. And this is in response to the email</p> <p>14 that you sent Sandy on August 2nd, correct?</p> <p>15 A. Yes. August 3rd?</p> <p>16 Q. In response to the email --</p> <p>17 A. Oh.</p> <p>18 Q. -- you sent on August 2nd.</p> <p>19 A. Oh, okay.</p> <p>20 Q. Which is the first page.</p> <p>21 A. Okay.</p> <p>22 Q. Is that right?</p> <p>23 A. Yes.</p> <p>24 Q. And in your email on August 2nd, you</p>

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<p>1 had asked to review the letter to Michael 2 Klein. 3 Who is Michael Klein? 4 A. He's the dean of the College of 5 Science and Technology. 6 Q. And here in this email on August 3rd, 7 Sandy told you that, "Equal Opportunity 8 Compliance does not have grievants review 9 the complaint notices," but you can inform 10 the notice by sending your own written 11 statement of the issues, correct? 12 A. Correct. 13 Q. And she goes on to actually request 14 your statement, right? 15 A. Correct. 16 Q. And she said to please set out in 17 writing the treatment that you find 18 discriminatory or harassment, the sources of 19 the dis -- the source of the disparate 20 treatment and/or unwelcome conduct, and the 21 basis for the unfair treatment from your 22 perspective, correct? 23 A. Correct. 24 Q. And she says that you can provide as</p>	<p>1 Q. And you told me you did keep a 2 record -- 3 A. Yes. 4 Q. -- correct? 5 And so now I want to know if there's 6 anything in that record you kept other than 7 the emails that you imported to your gmail. 8 A. No -- well, wait a minute. The 9 disciplinary, they were scanned, but that 10 wasn't from my email. 11 Q. Okay. So the record that you kept 12 were -- was the emails that you imported and 13 your written discipline; is that right? 14 A. Right, yes. 15 Q. Okay. 16 A. Uh-huh. 17 --- 18 (Whereupon, 9/9/12 email 19 string, Bates No. BRIGGS 24-29, was 20 marked as D Exhibit No. 30 for 21 identification.) 22 --- 23 BY MS. FENDELL-SATINSKY: 24 Q. Ms. Briggs, this is D-30. Take a</p>
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<p>1 much detail as you wish, right? 2 A. Correct. 3 Q. And she encourages you to keep a 4 record of pertinent new events going 5 forward. 6 Do you see that? 7 A. Yes. 8 Q. Did you do that? 9 A. Yes. 10 Q. How did you keep a record of 11 pertinent new events going forward? 12 A. Email. Sometimes notes, just email 13 notes to myself. 14 Q. Your record that you kept, would that 15 have been included in the documents you 16 imported to your gmail? 17 A. That would have -- prob -- yes. 18 Q. Were there any records you kept that 19 were not imported into your gmail? 20 A. Ask the question again. 21 Q. Sure. 22 So Ms. Foehl told you to keep a 23 record of pertinent new events, right? 24 A. Right.</p>	<p>1 look at this and let me know if you've seen 2 it before. 3 A. I have. Yes, I have. 4 Q. Okay. So starting on the first page, 5 which is BRIGGS 24, there is a September 9th 6 email from you to Sandy Foehl, correct? 7 A. Yes. 8 Q. And you respond that you're uncertain 9 about the status of your complaint, correct? 10 MR. MUNSHI: I'm sorry. Are 11 you reading from somewhere? I 12 missed that. 13 MS. FENDELL-SATINSKY: Yup. 14 So the email from September 9th. 15 The first sentence says, "I am 16 uncertain about the status of the 17 complaint." 18 BY MS. FENDELL-SATINSKY: 19 Q. Do you see that? 20 MR. MUNSHI: Oh. 21 BY MS. FENDELL-SATINSKY: 22 Q. Ms. Briggs, do you see that? 23 A. I see that, yes. I'm sorry. I 24 didn't know you were talking to me.</p>

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<p>1 Q. And you told me before that you told 2 Sandy not to do anything about your 3 complaint -- 4 A. But -- 5 Q. -- because -- let me finish my 6 question. 7 A. I'm sorry. 8 Q. You told me before you told Sandy not 9 to do anything about your complaint because 10 you were going out on FMLA leave to help 11 your son; is that correct? 12 A. That is correct. How -- can -- no? 13 Q. Go ahead. 14 A. Uhm, this was before I met with her, 15 I think. Can I check the dates? I mean, 16 I'm -- 17 Q. Sure. So if you look back at the 18 prior email, which was D-29, your meeting 19 with Sandy Foehl was on July 30th and this 20 email is from September 9th; so this email 21 that is D-30 is from after your meeting with 22 Ms. Foehl on July 30th. 23 A. Yes, it is. 24 Q. In the fourth to last paragraph of</p>	<p>1 Q. The last sentence of that paragraph 2 says, "I do know I was paid significantly 3 lower than two male staff members in the 4 dean's office who were my equals." 5 Who were they? 6 A. I'd rather not give their names. 7 Q. You have to give their names. 8 A. I have to, okay. Uhm, Vinodh 9 Ganesan. Do you want me to spell that? 10 Q. We can do it off the record. 11 A. Okay. 12 Q. And who was the other person? 13 A. There's a student worker. He's no 14 longer -- I don't -- 15 Q. It was a student worker who was paid 16 more than you? 17 A. No, he wasn't paid more than me. 18 Q. Okay. 19 A. But he told me that he knew. 20 Q. So, so I'm asking: That last 21 sentence says, I know -- "I do know that I 22 was paid significantly lower than two male 23 staff members in the dean's office who were 24 my equals." And I want to know who the two</p>
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<p>1 your email that starts, "The reason for 2 reporting this" -- 3 A. What page? 4 Q. The first page. Same email -- 5 A. Okay. 6 Q. -- from September 9th. 7 A. Okay. 8 Q. Do you see it says, "The reason for 9 reporting this to you"? 10 A. (No response.) 11 Q. Do you see that paragraph? 12 A. To Sandy? 13 Q. Yes. 14 A. Okay. I'm, I'm -- 15 Q. On BRIGGS 24, the fourth to last 16 paragraph. 17 A. Oh, I was up on the top. And I'm 18 sorry. 19 Q. The fourth to last paragraph says, 20 "The reason for reporting this to you." 21 Do you see that? 22 A. Uh-huh. 23 Q. Is that a "yes"? 24 A. Yes. I'm sorry.</p>	<p>1 male staff members were in the dean's office 2 who were your equals who were paid more than 3 you. 4 A. Vinodh Ganesan, V I N O D-H, Ganesan, 5 G-A-N-E-S-A-N. 6 Q. And who was the other one? 7 A. I'm sorry. Roger Catedo (sic). 8 Q. And what was Roger's position? 9 A. He was in facili -- I don't know what 10 his title is, facilities. 11 Q. And what was Vinodh's position? 12 A. He was the IT per -- head of the IT 13 in the dean's office. 14 Q. And they were not within Dr. Wu's 15 office, correct? 16 A. This is before Dr. Wu's. 17 Q. You told me that you started working 18 for Dr. Wu in 2009. This is be -- this is 19 in 2012. 20 A. I know, but these people that this 21 was -- they told me when I was in the dean's 22 office under Keya Sadeghipour. 23 Q. So that's back from 2006? 24 A. That would be, yup.</p>

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<p>1 Q. Around 2006?</p> <p>2 A. Around, around, yes.</p> <p>3 Q. And did you ask them what their</p> <p>4 salaries were?</p> <p>5 A. No, I didn't.</p> <p>6 Q. How did you know what their salaries</p> <p>7 were?</p> <p>8 A. One of them came to me and told me</p> <p>9 that I needed to stand up for myself and</p> <p>10 gave me suggestions about how to do it.</p> <p>11 Q. And who was that?</p> <p>12 A. Vinodh.</p> <p>13 Q. And how did you know the other</p> <p>14 person's salary?</p> <p>15 A. That was hearsay from Vinodh.</p> <p>16 Q. From who?</p> <p>17 A. From Vinodh.</p> <p>18 Q. Got it.</p> <p>19 And did you ever complain about being</p> <p>20 paid less than them prior to this email on</p> <p>21 September 9th?</p> <p>22 A. Not to my knowledge.</p> <p>23 Q. In the last sentence -- the last --</p> <p>24 second to last sentence of your email says,</p>	<p>1 set things in motion. I didn't know. I</p> <p>2 had, I had no idea if I'd set things kind of</p> <p>3 in motion and once she knew it she had to</p> <p>4 act on it.</p> <p>5 Q. Your testimony was, correct me if I'm</p> <p>6 wrong, but your testimony was that you told</p> <p>7 Sandy Foehl in the meeting on July 20th not</p> <p>8 to do anything with your complaint</p> <p>9 because --</p> <p>10 A. I did.</p> <p>11 Q. -- you were taking FMLA leave.</p> <p>12 A. I know, but I did --</p> <p>13 Q. Correct?</p> <p>14 A. Correct.</p> <p>15 Q. Okay.</p> <p>16 A. Correct, yes.</p> <p>17 Q. And so -- and you told Sandy Foehl</p> <p>18 again on September 9th not to -- you did not</p> <p>19 authorize any action on September 9th,</p> <p>20 correct?</p> <p>21 A. I did.</p> <p>22 Q. You specifically told her that you</p> <p>23 were not authorizing any action, right?</p> <p>24 A. Yes. That's true.</p>
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<p>1 "I am not authorizing any action on my part,</p> <p>2 because I am waiting to be cleared for FMLA</p> <p>3 for a short period to care for my son, who</p> <p>4 has a spinal cord injury."</p> <p>5 Do you see that?</p> <p>6 A. Yes, I do.</p> <p>7 Q. And then in the email above this</p> <p>8 email we just reviewed, it's a September 9th</p> <p>9 email from you to Rhonda Brown, correct?</p> <p>10 A. Correct.</p> <p>11 Q. And you say, "I regret having seen</p> <p>12 Sandy Foehl, because I could not see the</p> <p>13 original complaint, nor have I heard if it</p> <p>14 was filed or how it will be addressed,"</p> <p>15 correct?</p> <p>16 A. Correct.</p> <p>17 Q. But you told me previously that you</p> <p>18 told Sandy Foehl not to do anything with</p> <p>19 your complaint because you were going out on</p> <p>20 FMLA leave, correct?</p> <p>21 A. I didn't understand really what she</p> <p>22 was going to do. I didn't know if, the</p> <p>23 letter, she was waiting to send the letter</p> <p>24 to Dean Klein after my approval or if I had</p>	<p>1 ---</p> <p>2 (Whereupon, 11/2/12 email</p> <p>3 regarding job description, Bates No.</p> <p>4 TEMPLE UNIVERSITY</p> <p>5 (R.BRIGGS)-0000202, was marked as D</p> <p>6 Exhibit No. 31 for identification.)</p> <p>7 ---</p> <p>8 BY MS. FENDELL-SATINSKY:</p> <p>9 Q. Ms. Briggs, have you seen this</p> <p>10 exhibit marked as D-31 before?</p> <p>11 A. Yes.</p> <p>12 Q. Am I correct that you had no</p> <p>13 communications with Ms. Foehl between</p> <p>14 September 2012 and this email on November</p> <p>15 2nd, 2012?</p> <p>16 A. Can you ask the question again,</p> <p>17 please?</p> <p>18 Q. Sure.</p> <p>19 Am I correct that you had no</p> <p>20 communications with Sandy Foehl between your</p> <p>21 email on September 9th, 2012, which we just</p> <p>22 reviewed at D-30, and this email from</p> <p>23 November 2nd, 2012, which is marked as D-31?</p> <p>24 A. No. Not to my knowledge, no.</p>

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<p>1 Q. So there were no communications 2 between you and Ms. Foehl between September 3 9th and November 2nd, correct? 4 MR. MUNSHI: Objection. She 5 just answered that question. 6 THE WITNESS: I'm thinking. 7 I'm thinking. I'm trying to -- 8 MS. FENDELL-SATINSKY: My 9 question was unclear, because I 10 asked her "correct" and she had said 11 "no," but then she said, "No, not to 12 my knowledge," so I'm just 13 clarifying that there were no 14 commun -- 15 THE WITNESS: There -- 16 BY MS. FENDELL-SATINSKY: 17 Q. "Yes" or "no," were there 18 communications between you and Sandy Foehl 19 between September 9th, 2012 and November 20 2nd, 2012? 21 A. I don't know the answer to that 22 question. There were emails, but I don't 23 know what the dates were, to be honest. 24 Q. So you don't know if there were</p>	<p>1 BY MS. FENDELL-SATINSKY: 2 Q. Ms. Briggs, this is a document marked 3 as D-32. And so if you go to the second 4 page of this document, this is the email 5 that we just reviewed from November 12 that 6 was marked as D-31, and here on D-32 is 7 Ms. Foehl's response to you, correct? 8 A. Correct. 9 Q. And Ms. Foehl in her email to you 10 from November 5th says that you had written 11 that you were not authorizing any action on 12 her part on Septem -- on your part, excuse 13 me, on September 9th, correct? 14 A. To file the Complaint, yes. 15 Q. And so Ms. Foehl says, "If you are 16 now authorizing action, will you please 17 respond to my request of April 30th, 2012 18 for a written statement setting out the 19 particular instances of bullying, threats of 20 dismissal, and expressions of age bias by 21 Dr. Wu and/or Mr. Wacker," correct? 22 A. Correct. 23 Q. And she says the email forwarded from 24 Dr. Wu -- "the email from Dr. Wu forwarded</p>
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<p>1 communications between you and Sandy Foehl 2 between September 9th, 2012 and November 3 2nd, 2012? 4 A. I don't know. 5 Q. If there were communications, would 6 they be -- would they have been written 7 communications by email? 8 A. Yeah, they are. And, actually, I 9 read them yesterday from the Complaint. 10 Q. So if there were communications 11 between you and Ms. Foehl between September 12 9th, 2012 and November 2nd, 2012 there, we 13 would have documented emails of that, those 14 conversations; is that right? 15 A. Yes. 16 --- 17 (Whereupon, 11/5/12 email 18 regarding job description, Bates No. 19 TEMPLE UNIVERSITY 20 (R.BRIGGS)-0000199-200, was marked 21 as D Exhibit No. 32 for 22 identification.) 23 --- 24</p>	<p>1 by you on September 9th, 2012 is not 2 discriminatory on its face," correct? 3 A. Yes. 4 Q. And then if you go down, she asks, 5 "Who is paid more than you for the same 6 work?" In the second paragraph, the last 7 sentence. 8 A. Are we on 199? 9 Q. Yup. 10 A. Okay. 11 Q. The last sentence of the second 12 paragraph on 199. 13 A. (No response.) 14 Q. Do you see that? 15 A. Uh-huh. 16 Q. Yes? 17 A. Yes. 18 Q. And were those the two males that you 19 replied to or that you told me about earlier 20 who were paid more than you? 21 A. Yes. 22 Q. Was there anyone else other than 23 those two males who you believe was paid 24 more than you for the same work?</p>

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<p>1 A. No.</p> <p>2 Q. How old were those two individuals?</p> <p>3 A. Thirty to mid-thirties, something.</p> <p>4 Q. Both of them?</p> <p>5 A. Vin was mid-thirties, mid-thirties at</p> <p>6 the time.</p> <p>7 Q. Okay.</p> <p>8 A. Uhm --</p> <p>9 Q. And I don't have the attachment to</p> <p>10 this email, but Ms. Foehl says that she</p> <p>11 attached direction to the federal, state,</p> <p>12 and municipal offices in Philadelphia.</p> <p>13 Do you see that?</p> <p>14 A. Yes.</p> <p>15 Q. And if you look up at attachments, it</p> <p>16 shows there was --</p> <p>17 A. Right.</p> <p>18 Q. -- "agency list_eoc.doc."</p> <p>19 Do you see that?</p> <p>20 A. Yes, uh-huh.</p> <p>21 Q. And so Ms. Foehl provided you with</p> <p>22 information about how you could make a</p> <p>23 complaint to a government agency, correct?</p> <p>24 A. Correct.</p>	<p>1 another job. That can't be right."</p> <p>2 Who were the two people in the dean's</p> <p>3 office who told you that?</p> <p>4 A. Greg Wacker and Dean -- and Drew</p> <p>5 DiMeo.</p> <p>6 Q. And they told you that you could find</p> <p>7 another job?</p> <p>8 A. If I didn't like it, I could look for</p> <p>9 another job.</p> <p>10 Q. When did they say that to you?</p> <p>11 A. Whenever I complained, basically,</p> <p>12 "Look for another job."</p> <p>13 Q. And did you start to look for another</p> <p>14 job at that time?</p> <p>15 A. I bid on many jobs throughout the</p> <p>16 time.</p> <p>17 Q. Many jobs internally?</p> <p>18 A. Internally, uh-huh.</p> <p>19 Q. Did you look for any jobs externally?</p> <p>20 A. I did not.</p> <p>21 THE COURT REPORTER: Didn't we</p> <p>22 just do 33?</p> <p>23 MS. FENDELL-SATINSKY: No; 32.</p> <p>24 I just checked.</p>
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<p>1 Q. And you did not file any complaint</p> <p>2 with a government agency at this time,</p> <p>3 correct?</p> <p>4 A. I did not.</p> <p>5 Q. You did not at this time, correct?</p> <p>6 A. Not at that time, no.</p> <p>7 ---</p> <p>8 (Whereupon, 2/8/13 email</p> <p>9 string, Bates No. BRIGGS 38, was</p> <p>10 marked as D Exhibit No. 33 for</p> <p>11 identification.)</p> <p>12 ---</p> <p>13 BY MS. FENDELL-SATINSKY:</p> <p>14 Q. Ms. Briggs, have you seen this</p> <p>15 document before?</p> <p>16 A. Yes, I have.</p> <p>17 Q. You say, "Rhonda, I am so bullied and</p> <p>18 harassed all day."</p> <p>19 Does the bullying and harassment</p> <p>20 relate to anything more than what we've</p> <p>21 talked about already today?</p> <p>22 A. No, it does not.</p> <p>23 Q. And you say, "Two people in the</p> <p>24 dean's office tell me that I can find</p>	<p>1 THE COURT REPORTER: Okay.</p> <p>2 MR. MUNSHI: This is -- the</p> <p>3 new one is 34.</p> <p>4 MS. FENDELL-SATINSKY: Is it?</p> <p>5 THE WITNESS: This should be</p> <p>6 34.</p> <p>7 THE COURT REPORTER: Okay.</p> <p>8 That's what I thought. I messed up.</p> <p>9 It was 33, the last one.</p> <p>10 THE WITNESS: Thirty-three,</p> <p>11 yes.</p> <p>12 THE COURT REPORTER: This one</p> <p>13 is 34.</p> <p>14 MS. FENDELL-SATINSKY: Okay.</p> <p>15 THE COURT REPORTER: Okay,</p> <p>16 sorry.</p> <p>17 MS. FENDELL-SATINSKY: That's</p> <p>18 okay.</p> <p>19 ---</p> <p>20 (Whereupon, 2/8/13 email</p> <p>21 string "urgent," Bates No. TEMPLE</p> <p>22 UNIVERSITY (R.BRIGGS)-0000197-198,</p> <p>23 was marked as D Exhibit No. 34 for</p> <p>24 identification.)</p>

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<p>1 - - -</p> <p>2 BY MS. FENDELL-SATINSKY:</p> <p>3 Q. Ms. Briggs, this is a document that's</p> <p>4 been marked as D-34.</p> <p>5 Have you seen this document before?</p> <p>6 A. Yes, I have.</p> <p>7 Q. And the bottom email, the first</p> <p>8 email, is an email from you to Sandy Foehl</p> <p>9 on February 8th, 2013.</p> <p>10 A. Yes.</p> <p>11 Q. Correct?</p> <p>12 A. Correct.</p> <p>13 Q. And in response to your email,</p> <p>14 Ms. Foehl told you, "This is an issue for</p> <p>15 Human Resources first," correct?</p> <p>16 A. Correct.</p> <p>17 Q. And she said to address the situation</p> <p>18 with Deirdre Walton in Labor & Employee</p> <p>19 Relations, correct?</p> <p>20 A. Correct.</p> <p>21 Q. And did you contact Ms. Walton after</p> <p>22 receiving this email?</p> <p>23 A. Yes.</p> <p>24 Q. How quickly after this email did you</p>	<p>1 A. Yes.</p> <p>2 Q. Did I pronounce his last name right?</p> <p>3 A. I don't know the...</p> <p>4 Q. Okay. We'll just say from you to</p> <p>5 Cameron.</p> <p>6 A. Yes.</p> <p>7 Q. And you reached out to Cameron to</p> <p>8 request a confidential in -- a confidential</p> <p>9 conversation to discuss disparate treatment</p> <p>10 which you believe is related to your age of</p> <p>11 58, correct?</p> <p>12 A. Correct.</p> <p>13 Q. Why did you reach out to Cameron?</p> <p>14 A. Because I was always referred back to</p> <p>15 Sandy -- I mean to Deirdre Walton. And I</p> <p>16 had met Cameron. I believe he was outside</p> <p>17 counsel. I can't say that for sure, but</p> <p>18 he's the one who interviewed me for the</p> <p>19 Hunnewell thing and I felt really -- he was</p> <p>20 a very trusting -- I felt trusting. And</p> <p>21 then I heard he came to Temple, and I</p> <p>22 contacted him.</p> <p>23 Q. And Cameron then responded to you,</p> <p>24 and he told you about his schedule and</p>
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<p>1 contact Ms. Walton?</p> <p>2 A. I don't remember the dates.</p> <p>3 - - -</p> <p>4 (Whereupon, 2/11/13 email</p> <p>5 string regarding Confidential</p> <p>6 communication, Bates No.</p> <p>7 TEMPLE0196-199, was marked as D</p> <p>8 Exhibit No. 35 for identification.)</p> <p>9 - - -</p> <p>10 BY MS. FENDELL-SATINSKY:</p> <p>11 Q. Ms. Briggs, have you seen this</p> <p>12 document before?</p> <p>13 A. Yes, I have.</p> <p>14 Q. I want you to turn to TEMPLE0198.</p> <p>15 A. (Witness complies with request.)</p> <p>16 Q. It's the first email in this chain.</p> <p>17 A. Okay.</p> <p>18 Q. Do you see it?</p> <p>19 A. Uh-huh.</p> <p>20 Q. Is that a "yes"?</p> <p>21 A. Yeah. I'm sorry. Yes.</p> <p>22 Q. Is this a February -- this is a</p> <p>23 February 9th, 2013 email from you to Cameron</p> <p>24 Etezady.</p>	<p>1 recommended that you speak with Sandy Foehl</p> <p>2 or Tracey Hamilton in EOC, correct?</p> <p>3 A. That is correct.</p> <p>4 Q. And then you replied to Cameron and</p> <p>5 you relayed to him various things, including</p> <p>6 since you provided a statement years ago for</p> <p>7 a discrimination lawsuit by Tanya Hunnewell</p> <p>8 in which I did not -- "in which I</p> <p>9 contradicted the story that I was coached to</p> <p>10 report, I do not trust she has my best</p> <p>11 interest at heart."</p> <p>12 And that was what you were saying</p> <p>13 about Sandy Foehl, correct?</p> <p>14 A. I was saying that about Deirdre</p> <p>15 Walton, actually.</p> <p>16 Q. Okay. And you told me before that it</p> <p>17 was Greg Wacker who coached you to say</p> <p>18 something different than what happened with</p> <p>19 regards to Ms. Hunnewell?</p> <p>20 A. It was Greg Wacker, but -- say your</p> <p>21 question again.</p> <p>22 Q. Sure.</p> <p>23 A. I'm sorry.</p> <p>24 Q. You told me before it was Greg Wacker</p>

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<p>1 who coached you to report --</p> <p>2 A. Yes.</p> <p>3 Q. -- something wrong about -- something</p> <p>4 that was incorrect about Ms. Hunnewell; is</p> <p>5 that correct?</p> <p>6 A. Yes.</p> <p>7 Q. And here you're saying that you don't</p> <p>8 trust Deirdre because Greg coached you to</p> <p>9 report something different; is that correct?</p> <p>10 A. That is correct.</p> <p>11 Q. Deirdre did not coach you to report</p> <p>12 something different?</p> <p>13 A. No, she did not.</p> <p>14 Q. In response to this email, Cameron</p> <p>15 referred you to Fay Trachtenberg in his</p> <p>16 office, correct?</p> <p>17 A. Yes.</p> <p>18 Q. Or he said he could meet with you the</p> <p>19 following week; is that right?</p> <p>20 A. That is correct.</p> <p>21 Q. And you explain in your response to</p> <p>22 him on February 11th that you're not</p> <p>23 uncomfortable with Sandy, but Sandy referred</p> <p>24 you to Deirdre, correct?</p>	<p>1 (Whereupon, 4/25/13 email</p> <p>2 string, Bates No. BRIGGS 51-52, was</p> <p>3 marked as D Exhibit No. 36 for</p> <p>4 identification.)</p> <p>5 ---</p> <p>6 BY MS. FENDELL-SATINSKY:</p> <p>7 Q. Ms. Briggs, this is D-36.</p> <p>8 Have you seen these emails before?</p> <p>9 A. I have.</p> <p>10 Q. So, so if we go back to D-34, which</p> <p>11 was two exhibits before, on February 8th,</p> <p>12 2013, Ms. Foehl told you to contact Deirdre</p> <p>13 Walton, correct?</p> <p>14 A. Correct.</p> <p>15 Q. And then if you look at D-36, this is</p> <p>16 an email from April 25th from you to</p> <p>17 Deirdre Walton, correct?</p> <p>18 A. That is correct.</p> <p>19 Q. And you write in the email that you</p> <p>20 appreciate Deirdre taking the time to meet</p> <p>21 with you that past Monday, correct?</p> <p>22 A. Correct.</p> <p>23 Q. Was that the first meeting you had</p> <p>24 with Deirdre Walton?</p>
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<p>1 A. Correct.</p> <p>2 Q. And you say that you have no history</p> <p>3 with Fay and should you contact her on your</p> <p>4 own, correct?</p> <p>5 A. What page is that?</p> <p>6 MR. MUNSHI: First page.</p> <p>7 BY MS. FENDELL-SATINSKY:</p> <p>8 Q. 196, the first page.</p> <p>9 A. Okay.</p> <p>10 Q. The bottom email from you to Cameron.</p> <p>11 A. Looks familiar, yeah, I guess.</p> <p>12 Q. And you found --</p> <p>13 A. Yes.</p> <p>14 Q. Did you find Cameron helpful and</p> <p>15 responsive?</p> <p>16 A. I did.</p> <p>17 Q. And Cameron responds to you and says</p> <p>18 that he had given Fay a heads-up and she is</p> <p>19 on this email, you can call her to set up a</p> <p>20 time or use her email --</p> <p>21 A. Yes.</p> <p>22 Q. -- correct?</p> <p>23 A. That is correct.</p> <p>24 ---</p>	<p>1 A. Yes.</p> <p>2 Q. So you did not meet with Deirdre</p> <p>3 Walton between February 8th, 2013 and April</p> <p>4 25th -- I'm sorry, February 20 -- you did</p> <p>5 not meet with Ms. Walton between February</p> <p>6 8th, 2013 and the week of February 21st,</p> <p>7 20 -- the week of February -- I'm getting</p> <p>8 myself all confused now.</p> <p>9 There was no meeting between you and</p> <p>10 Ms. Walton between February 8th, 2013 and</p> <p>11 the week of April 21st, 2013, correct?</p> <p>12 A. 2013?</p> <p>13 Q. Yes.</p> <p>14 A. Not that I recall.</p> <p>15 Q. Okay. And going back to D-36, you</p> <p>16 say your interactions with Dr. Wu and Drew</p> <p>17 had been very positive and friendly since</p> <p>18 you met with Deirdre, and your anxiety has</p> <p>19 decreased significantly, correct?</p> <p>20 A. Correct.</p> <p>21 Q. And so you found the meeting with</p> <p>22 Deirdre to be helpful; is that right?</p> <p>23 A. Yes.</p> <p>24 Q. And Deirdre responded to you on the</p>

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<p>1 same day and said that you were welcome and</p> <p>2 she was happy to hear that the meeting, she</p> <p>3 says, "have approved." I think she meant</p> <p>4 "improved." And if you need to talk to her,</p> <p>5 please feel free to reach out, correct?</p> <p>6 A. Correct.</p> <p>7 Q. And she also said, "Please do look at</p> <p>8 any other position here at the University</p> <p>9 that meet your skills and background, and</p> <p>10 let me know if you see anything," correct?</p> <p>11 A. Correct.</p> <p>12 Q. During the meeting that you had with</p> <p>13 Deirdre Walton in April 2013, is that when</p> <p>14 she lifted the ban on your ability to apply</p> <p>15 for jobs internally?</p> <p>16 A. I don't recall. I really -- it was</p> <p>17 probably around that time, because I -- I</p> <p>18 must have been on probation. Yes, so it had</p> <p>19 to have been, yes. There is an email about</p> <p>20 that somewhere.</p> <p>21 Q. And you did ultimately contact</p> <p>22 Ms. Walton on a number of occasions about</p> <p>23 other jobs, correct?</p> <p>24 A. Well, I would apply -- she told me to</p>	<p>1 Q. And you're asking her for her</p> <p>2 feedback, right?</p> <p>3 A. Yes.</p> <p>4 Q. In the second paragraph, you say, "I</p> <p>5 received reports from three faculty members</p> <p>6 about Dr. Wu making untrue and disparaging</p> <p>7 remarks about me in the presence of</p> <p>8 faculty."</p> <p>9 Who are the three faculty members?</p> <p>10 A. Alex Yates, Alexander Yates; Frank</p> <p>11 Friedman; and Robert Aiken.</p> <p>12 Q. Did they speak to you together or</p> <p>13 individually?</p> <p>14 A. They were separate conversations.</p> <p>15 Q. Were they oral conversations?</p> <p>16 A. Yes.</p> <p>17 Q. Where did the conversations occur?</p> <p>18 A. Probably in their office or -- I</p> <p>19 would say in their office.</p> <p>20 Q. Did you reach out to them to discuss</p> <p>21 Dr. Wu?</p> <p>22 A. No, I did not.</p> <p>23 Q. Is it your testimony that each of</p> <p>24 them approached you to speak with you about</p>
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<p>1 bid on the job and let her know that I did.</p> <p>2 Q. Right. So you contacted her on</p> <p>3 occasions about jobs that were available?</p> <p>4 A. Right. Or sometimes for advice, do</p> <p>5 you think it's a good fit or...</p> <p>6 ---</p> <p>7 (Whereupon, various emails</p> <p>8 regarding available jobs, Bates No.</p> <p>9 BRIGGS 53-57, was marked as D</p> <p>10 Exhibit No. 37 for identification.)</p> <p>11 ---</p> <p>12 BY MS. FENDELL-SATINSKY:</p> <p>13 Q. Ms. Briggs, have you seen this</p> <p>14 document before?</p> <p>15 A. Yes, I have.</p> <p>16 Q. So there's three emails attached to</p> <p>17 this exhibit that's D-37. Okay?</p> <p>18 A. Uh-huh, yes.</p> <p>19 Q. So, we'll start with the first one.</p> <p>20 A. Okay.</p> <p>21 Q. So here you're contacting Ms. Walton</p> <p>22 about a job posting in the School of Media</p> <p>23 and Communication, correct?</p> <p>24 A. Yes.</p>	<p>1 Dr. Wu?</p> <p>2 A. That's not how it happened either.</p> <p>3 Q. Okay. So why don't you tell me --</p> <p>4 A. Listen.</p> <p>5 Q. -- how it happened.</p> <p>6 A. I can't say for sure why I was</p> <p>7 meeting with them. I might have been</p> <p>8 working on an event and...</p> <p>9 Q. So during meetings with Alexander</p> <p>10 Yates, Frank Friedman, and Robert Akin, they</p> <p>11 told you that Dr. Wu was making untrue and</p> <p>12 disparaging remarks about you?</p> <p>13 A. (No response.)</p> <p>14 Q. Let me ask you something else.</p> <p>15 What did they -- what did Alexander</p> <p>16 Yates tell you that Dr. Wu said about you?</p> <p>17 A. When, when I made a mistake, they</p> <p>18 would be said to faculty.</p> <p>19 Q. Anything else?</p> <p>20 A. Like a discipline.</p> <p>21 It was told to one -- well, actually,</p> <p>22 it might have been at a faculty meeting, I</p> <p>23 don't know, but that I had, uh, made a</p> <p>24 mistake -- not a mistake, but I had not</p>

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<p>1 followed through on a promotion and tenure 2 timeline. 3 Q. Anything else that Alexander Yates 4 told you -- 5 A. Well -- 6 Q. -- that Dr. Wu said about you? 7 A. No. 8 Q. And did Alexander Yates say that the 9 statements, those statements that you just 10 testified to, were untrue and disparaging, 11 or did you believe those statements were 12 untrue and disparaging? 13 A. I believed they were untrue. 14 Q. What did Frank Friedman tell you that 15 Dr. Wu said about you? 16 A. Pretty much the same thing. It was a 17 lot about faculty promotion and tenure and 18 hiring faculty. 19 Q. Was there only -- was there just one 20 conversation with Alexander Yates about 21 this? 22 A. It was -- yeah. It was in passing, I 23 have to tell you. It wasn't like a meeting. 24 He didn't --</p>	<p>1 that Dr. Wu said about you? 2 A. It was all about, it was all about 3 the same thing, promotion and tenure. 4 Q. Did Robert Aiken tell you that more 5 than once? 6 A. No. 7 Q. Did Robert Aiken say the statements 8 were untrue and disparaging, or did you feel 9 that the statements that Robert Aiken 10 relayed were untrue and disparaging? 11 A. I believed that they were untrue and 12 disparaging. 13 Q. The next sentence says, "Two staff 14 members and a student worker reported to me 15 that they overheard Dr. Wu talking about the 16 disciplinary action in the public setting." 17 Who were the two staff members and 18 the student worker? 19 A. Taylor Lentz was one of them, and 20 Mary Kate Galenski (ph) was another one, and 21 it was after I was on probation for three 22 days. 23 Q. So Taylor Lentz was a student worker, 24 correct?</p>
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<p>1 Q. Okay. Before, you told me that it 2 was during meetings in their -- 3 A. Well, I mean, I went in their office 4 for something, and I can't remember what it 5 was. 6 Q. Okay. So did Alexander Yates tell 7 you on more than one occasion that Dr. Wu 8 made remarks about you? 9 A. Just one occasion. 10 Q. Frank Friedman, you said, relayed 11 similar comments as Alexander Yates, 12 correct? 13 A. That is true. 14 Q. And did Frank Friedman relay that to 15 you on one occasion or more than one? 16 A. About the remarks, no. One occasion. 17 Q. And, again, did Frank Friedman say 18 those comments were untrue and disparaging 19 or did you interpret the comments Frank 20 Friedman relayed to you as untrue and 21 disparaging? 22 A. I interpreted them as untrue and 23 disparaging. 24 Q. Robert Aiken, what did he tell you</p>	<p>1 A. Yes. 2 Q. And who was Mary Kate Galenski? 3 A. A student worker. 4 Q. This sentence says two staff members 5 and "a" student worker. 6 A. I can't remember now. 7 Q. So are you now saying that it's -- 8 A. I'm not -- 9 Q. -- two student workers who reported 10 this to you? 11 A. I can't -- I don't recall. 12 Q. So do you not recall who said this to 13 you? 14 A. I recall Taylor and Mary Kate did. 15 Q. Okay. And Mary Kate was a student 16 worker, correct? 17 A. A student worker. 18 Q. And this sentence in this email says 19 "a" student worker, right? 20 A. What paragraph was that? 21 Q. The second paragraph, the last 22 sentence. 23 A. I, I don't remember who I, I -- 24 Q. Okay.</p>

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<p style="text-align: right;">Page 425</p> <p>1 A. I know --</p> <p>2 Q. I'm saying: This last sentence</p> <p>3 refers to "a" student worker, correct?</p> <p>4 A. It's two student workers.</p> <p>5 Q. So it's an er -- there is a --</p> <p>6 A. An error, uh-huh.</p> <p>7 Q. -- a mistake in your email?</p> <p>8 A. Uh-huh.</p> <p>9 Q. So was it two student workers and one</p> <p>10 staff member or two student workers and you</p> <p>11 don't remember who else?</p> <p>12 A. Well, John Ikoniak knew. He was a</p> <p>13 staff member. I don't -- I must have -- it</p> <p>14 must be a typo. So it was Mary Kate, Taylor</p> <p>15 Lentz, and John Ikoniak.</p> <p>16 Q. And you said that they told you this</p> <p>17 after your three-day suspension, correct?</p> <p>18 A. Yes.</p> <p>19 Q. Did they tell you together or</p> <p>20 individually?</p> <p>21 A. Oh, individually.</p> <p>22 Q. And what did they tell you?</p> <p>23 A. They said, "So what happened that you</p> <p>24 were suspended?"</p>	<p style="text-align: right;">Page 427</p> <p>1 A. Yes.</p> <p>2 Q. This is communication from you to</p> <p>3 Deirdre Walton regarding two positions, and</p> <p>4 you're asking her thoughts on them, correct?</p> <p>5 A. Uh-huh, yes.</p> <p>6 Q. And the last page of this packet is</p> <p>7 an email from you to Deirdre Walton about</p> <p>8 another position, correct?</p> <p>9 A. Yes.</p> <p>10 Q. Did you bid for any of the positions</p> <p>11 that are referenced in these emails?</p> <p>12 A. I think I did. I can't remember</p> <p>13 which ones. But I did want her feedback,</p> <p>14 which I didn't get. I might have -- I'm</p> <p>15 sure there's a record of what I bid on. I</p> <p>16 don't -- but she didn't get back to me about</p> <p>17 that.</p> <p>18 Q. Okay. Let's turn back to D-38.</p> <p>19 A. (Witness complies with request.)</p> <p>20 Q. So have you seen this document</p> <p>21 before?</p> <p>22 A. Yes, I have.</p> <p>23 Q. And these are a series of emails</p> <p>24 between you and Cameron, correct?</p>
<p style="text-align: right;">Page 426</p> <p>1 And I -- first of all, I didn't tell</p> <p>2 them why, but I was humiliated.</p> <p>3 I asked him, you know, "Dr. Wu,</p> <p>4 please keep it confidential," and...</p> <p>5 Q. Did they tell you anything other than</p> <p>6 asking you why you were suspended?</p> <p>7 A. No, they, they did not.</p> <p>8 ---</p> <p>9 (Whereupon, 8/8/13 email</p> <p>10 string, Bates No. BRIGGS 64-67, was</p> <p>11 marked as D Exhibit No. 38 for</p> <p>12 identification.)</p> <p>13 ---</p> <p>14 THE COURT REPORTER:</p> <p>15 Thirty-eight.</p> <p>16 BY MS. FENDELL-SATINSKY:</p> <p>17 Q. Ms. Briggs, this is an email that --</p> <p>18 you know what, before we do that, let's go</p> <p>19 finish. I apologize. That's my fault. I</p> <p>20 didn't complete going through D-37, so let's</p> <p>21 turn back to D-37 for a moment.</p> <p>22 A. Uh-huh.</p> <p>23 Q. BRIGGS 54, which is the second page</p> <p>24 of that exhibit.</p>	<p style="text-align: right;">Page 428</p> <p>1 A. Yes.</p> <p>2 Q. And they go back to the emails, uhm,</p> <p>3 that we previously stock -- that we</p> <p>4 previously reviewed, I apologize, from</p> <p>5 February 2013, right?</p> <p>6 A. Are we on 38? Is that the name, the</p> <p>7 number of the document?</p> <p>8 Q. Yup. It's on Exhibit 38.</p> <p>9 A. Okay.</p> <p>10 Q. And if you go to Page 66 and 67 --</p> <p>11 A. Okay.</p> <p>12 Q. -- these are the emails we previously</p> <p>13 reviewed between you and Cameron from</p> <p>14 February 2013, correct?</p> <p>15 A. Yes.</p> <p>16 Q. And then if you go to BRIGGS 64,</p> <p>17 which is the first page, that is an email</p> <p>18 from you to Cameron from August 6th, 2013,</p> <p>19 right?</p> <p>20 A. Yes.</p> <p>21 Q. And you say that you're forwarding</p> <p>22 the email you sent him in February; that you</p> <p>23 contacted Fay and she referred you to</p> <p>24 Deirdre Walton; you did reach out to Deirdre</p>

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<p>1 and ask if she would agree to meet with 2 Dr. Wu and Andrew DiMeo to serve in a 3 mediator-like role. 4 Was that the meeting that you had 5 with Deirdre Walton in April of 2013 that we 6 referred to before? 7 A. No, it wasn't. 8 Q. Okay. So what meeting was that that 9 you had with Deirdre in which you asked her 10 if she would agree to meet with Dr. Wu, 11 Drew DiMeo, and you to serve as a 12 mediator-like role? 13 A. She and I did not meet about that. 14 Q. Did you send her an email about that? 15 A. On several occasions. I don't know 16 if it was this date, though. 17 THE COURT REPORTER: You don't 18 know if it was? 19 THE WITNESS: Huh? Oh, I'm 20 sorry. I did email her and ask her 21 for her to help me, but I don't know 22 if it's in response to this. 23 BY MS. FENDELL-SATINSKY: 24 Q. You then write below you did not --</p>	<p>1 MR. MUNSHI: Can I grab one? 2 MS. FENDELL-SATINSKY: Oh, 3 sorry. I wrote D-39 on that one. 4 MR. MUNSHI: That's okay. 5 BY MS. FENDELL-SATINSKY: 6 Q. Ms. Briggs, have you seen this email 7 before? 8 A. Yes, I have. 9 Q. And this is an email from February 10 6th, 2013 (sic) from -- 11 A. '14. 12 Q. 2014, I apologize, from you to 13 Deirdre Walton, correct? 14 A. Correct. 15 Q. And you say that you're contacting 16 Deirdre about a recent telephone call that 17 you had about another disciplinary action 18 against you dated January 20th, 2014, 19 correct? 20 A. Correct. 21 Q. And during that meeting, did Deirdre 22 tell you that she would speak with Greg 23 Wacker about the matter? 24 A. Correct.</p>
Page 430	Page 432
<p>1 on the next page, you did not hear from her, 2 Deirdre, after your initial conversation 3 until you made contact with her in April 4 when you returned from a three-day 5 suspension without pay, correct? 6 A. Correct. 7 Q. And in response to this email, 8 Cameron told you that because you had worked 9 with Fay in the past, he would direct you to 10 her, as she generally handles employment 11 matters, correct? 12 A. Correct. 13 Q. And you told Cameron that Fay can -- 14 he can provide Fay with the background and 15 Fay can contact you, correct? 16 A. Correct. 17 --- 18 (Whereupon, 2/6/14 email 19 follow-up, Bates No. BRIGGS 69, was 20 marked as D Exhibit No. 39 for 21 identification.) 22 --- 23 THE COURT REPORTER: 24 Thirty-nine.</p>	<p>1 --- 2 (Whereupon, 2/22/14 email 3 regarding supporting defense 4 documents, Bates No. EEOC 0062-65, 5 was marked as D Exhibit No. 40 for 6 identification.) 7 --- 8 THE COURT REPORTER: Forty. 9 BY MS. FENDELL-SATINSKY: 10 Q. Ms. Briggs, have you seen this email 11 before? 12 A. Yes, I have. 13 Q. And this is from February 22nd, 2014. 14 It's an email from you to Deirdre Walton, 15 correct? 16 A. Correct. 17 Q. Uhm, if you look back at the email 18 that was D-39, the prior exhibit. 19 A. Okay. 20 Q. So the last exhibit we just looked 21 at. 22 A. Oh, okay. 23 Q. Up on the right-hand corner there is 24 a notation that says "6/20/14, 1:38 p.m."</p>

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<p>1 Do you see that?</p> <p>2 A. Where are, where are you? I'm sorry.</p> <p>3 Q. Sure. On D-39.</p> <p>4 A. Uh-huh.</p> <p>5 Q. In the upper right-hand corner --</p> <p>6 A. Uh-huh.</p> <p>7 Q. -- there's a notation that says</p> <p>8 "6/20/14, 1:38 p.m."</p> <p>9 A. Right.</p> <p>10 Q. See that?</p> <p>11 A. Yes.</p> <p>12 Q. And is that the date on which you</p> <p>13 accessed this email?</p> <p>14 A. No. It was when it was -- I printed</p> <p>15 it.</p> <p>16 Q. So this was printed after the end of</p> <p>17 your employment at Temple?</p> <p>18 A. Yes.</p> <p>19 Q. Correct?</p> <p>20 A. Correct. I'm sorry.</p> <p>21 Q. And you told me before the only thing</p> <p>22 that you did on your email after the end of</p> <p>23 your employment was import the emails,</p> <p>24 correct?</p>	<p>1 Q. And you told me that was the date on</p> <p>2 which you printed this email?</p> <p>3 A. Well, actually, I'm not sure what it</p> <p>4 means. I don't know if it's a header from</p> <p>5 when Temple printed it or if it's me. How</p> <p>6 do I tell?</p> <p>7 Q. Well, this is a document that you</p> <p>8 produced to us.</p> <p>9 A. Okay. Then I --</p> <p>10 Q. It says BRIGGS 60 --</p> <p>11 A. It was when I printed it then.</p> <p>12 Q. Okay. It says BRIGGS 69, so this is</p> <p>13 a document you gave to your attorney and he</p> <p>14 produced it to us.</p> <p>15 A. Okay. So then it was printed by me</p> <p>16 then.</p> <p>17 Q. Okay. So you're saying that you</p> <p>18 printed this document on June 20th, 2014,</p> <p>19 correct?</p> <p>20 A. That's what it says.</p> <p>21 Q. And you --</p> <p>22 A. Yes.</p> <p>23 Q. That was after the end of your</p> <p>24 employment at Temple, right?</p>
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<p>1 A. I need to make a correction. This</p> <p>2 isn't mine, from me. It was from Temple</p> <p>3 University mail. "Following up on our</p> <p>4 conversation" --</p> <p>5 Q. So this --</p> <p>6 A. I don't know what all these --</p> <p>7 Q. Okay.</p> <p>8 A. -- headers and footers are.</p> <p>9 Q. So this is an email from you to</p> <p>10 Deirdre Walton, correct?</p> <p>11 A. Correct.</p> <p>12 Q. And the email is dated February 6th,</p> <p>13 2014, right?</p> <p>14 A. Correct.</p> <p>15 Q. And this is an email from your Temple</p> <p>16 email, correct?</p> <p>17 A. Correct.</p> <p>18 Q. And there is a notation on the upper</p> <p>19 right-hand corner that says "6/20/14,"</p> <p>20 correct?</p> <p>21 A. Correct.</p> <p>22 Q. And June 20, '14 was after the end of</p> <p>23 your employment at Temple, right?</p> <p>24 A. Correct.</p>	<p>1 A. Correct.</p> <p>2 Q. And in printing this email on June</p> <p>3 20th, 2014, you were doing something other</p> <p>4 than importing emails from your Temple email</p> <p>5 to your gmail following the end of your</p> <p>6 employment at Temple, correct?</p> <p>7 A. I'm sorry. I don't -- I'm sure -- I</p> <p>8 don't understand the question.</p> <p>9 Q. Sure.</p> <p>10 MS. FENDELL-SATINSKY: Can you</p> <p>11 read it back, please.</p> <p>12 ---</p> <p>13 (Whereupon, the court reporter</p> <p>14 read back the last question.)</p> <p>15 ---</p> <p>16 THE WITNESS: Yes, yes?</p> <p>17 BY MS. FENDELL-SATINSKY:</p> <p>18 Q. So let's turn now to D-40.</p> <p>19 And this is an email from you to Ms.</p> <p>20 Walton.</p> <p>21 A. Uh-huh.</p> <p>22 Q. Correct?</p> <p>23 A. Yes.</p> <p>24 Q. And from February 22nd, 2014,</p>

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<p style="text-align: right;">Page 437</p> <p>1 correct?</p> <p>2 A. Correct.</p> <p>3 Q. And this is in regards to the</p> <p>4 discipline you received in January of 2014,</p> <p>5 correct?</p> <p>6 A. Correct, uh-huh, yes.</p> <p>7 Q. Did you have communications with</p> <p>8 Ms. Walton between February 6th, 2014 and</p> <p>9 February 22nd, 2014?</p> <p>10 A. I, I don't -- prob -- I, I don't know</p> <p>11 when, but I don't -- yeah.</p> <p>12 Q. I don't want you to guess.</p> <p>13 A. Okay. Then I don't know.</p> <p>14 Q. So if you don't remember --</p> <p>15 A. I don't know.</p> <p>16 Q. -- or you don't know, that's fine.</p> <p>17 But which is it, you don't know or</p> <p>18 you don't remember?</p> <p>19 A. I don't know.</p> <p>20 Q. Okay. On the upper right-hand corner</p> <p>21 of this document --</p> <p>22 A. Uh-huh.</p> <p>23 Q. -- there is a date. It says 4/21/14.</p> <p>24 Do you see that?</p>	<p style="text-align: right;">Page 439</p> <p>1 ---</p> <p>2 BY MS. FENDELL-SATINSKY:</p> <p>3 Q. Ms. Walton (sic), have you seen this</p> <p>4 email before?</p> <p>5 MR. MUNSHI: Briggs.</p> <p>6 THE WITNESS: Briggs.</p> <p>7 MS. FENDELL-SATINSKY: I'm</p> <p>8 sorry, Ms. Briggs.</p> <p>9 THE WITNESS: Yes.</p> <p>10 MS. FENDELL-SATINSKY: I'm</p> <p>11 looking at "Ms. Walton," your note</p> <p>12 on Ms. Walton.</p> <p>13 THE WITNESS: Yes, I have.</p> <p>14 MS. FENDELL-SATINSKY: Okay.</p> <p>15 BY MS. FENDELL-SATINSKY:</p> <p>16 Q. And this is an email from you to you,</p> <p>17 correct?</p> <p>18 A. Yes.</p> <p>19 Q. And you write -- the handwritten note</p> <p>20 on here, is that your note?</p> <p>21 A. "Note to self," is that you mean?</p> <p>22 Q. Yes.</p> <p>23 A. Yes, uh-huh.</p> <p>24 Q. And the underline on here, is that</p>
<p style="text-align: right;">Page 438</p> <p>1 A. I do.</p> <p>2 Q. And, again, uhm, I don't have the</p> <p>3 copy you provided to us. This is from the</p> <p>4 EEOC, but this is a document that I'll</p> <p>5 represent to you that you provided to the</p> <p>6 EEOC. Okay?</p> <p>7 A. Yes.</p> <p>8 Q. And so this 4/21/14 date, does that</p> <p>9 reflect that you printed this email on that</p> <p>10 date?</p> <p>11 A. I -- it -- I can't say for sure.</p> <p>12 Somebody printed it. It probably was me.</p> <p>13 Q. And do you have any reason to believe</p> <p>14 it wasn't you who printed this email on</p> <p>15 April 21st, 2014 if you provided this email</p> <p>16 to the EEOC?</p> <p>17 A. No, I don't have any reason.</p> <p>18 Q. And April 21st, 2014 was after the</p> <p>19 end of your employment at Temple, correct?</p> <p>20 A. Yes. Yes, it was.</p> <p>21 ---</p> <p>22 (Whereupon, 2/26/14 email,</p> <p>23 Bates No. EEOC 0066, was marked as D</p> <p>24 Exhibit No. 41 for identification.)</p>	<p style="text-align: right;">Page 440</p> <p>1 your underline?</p> <p>2 A. Yes, it is.</p> <p>3 Q. Okay. And this is from February</p> <p>4 26th, 2014, correct?</p> <p>5 A. Correct.</p> <p>6 Q. So this is a few days after you sent</p> <p>7 the email at D-40 to Ms. Walton, right?</p> <p>8 A. I'm sorry.</p> <p>9 Q. Sure.</p> <p>10 So, D-41 is after, comes after D-40,</p> <p>11 correct?</p> <p>12 A. Yes.</p> <p>13 Q. And you say here that Deirdre called</p> <p>14 after speaking with Greg to tell you that</p> <p>15 Greg told her that you came in at noon, did</p> <p>16 not call anyone, and claimed not to have an</p> <p>17 excuse for being late, correct?</p> <p>18 A. Yes.</p> <p>19 Q. And you write you told her that</p> <p>20 Dr. Wu asked you why you had not sent an</p> <p>21 email, and you told him that your computer</p> <p>22 was powered down and takes long to power up,</p> <p>23 correct?</p> <p>24 A. Right, correct.</p>

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<p>1 --- 2 (Whereupon, 2/25/14 email, 3 Bates No. TEMPLE0324, was marked as 4 D Exhibit No. 42 for 5 identification.) 6 --- 7 BY MS. FENDELL-SATINSKY: 8 Q. Ms. Briggs, have you seen D-42 9 before? 10 A. Yes. 11 Q. And this is an email from February 12 25th from you to Sandy Foehl in which you 13 say, "I want to schedule an appointment to 14 file a complaint," correct? 15 A. Correct. 16 Q. And other than the emails that we've 17 reviewed, did you have any other 18 conversations with Sandy Foehl -- let me ask 19 a different question. 20 A. Okay. 21 Q. Other than the emails we've 22 reviewed -- 23 A. Okay. 24 Q. -- and the communications and</p>	<p>1 the emails that we reviewed? 2 A. No, I did not. 3 Q. And in this email you tell Sandy that 4 you plan to file an EEOC complaint 5 internally and that you've already had a 6 phone intake with the EEOC, correct? 7 A. Correct. 8 Q. When did you have your phone intake 9 with the EEOC? 10 A. I don't know. I mean, it's around 11 the same time. 12 Q. At the time you had a phone intake 13 with the EEOC, had you retained an attorney? 14 A. No. 15 Q. When did you retain an attorney? 16 A. I think in June. June, maybe. 17 Q. June 2014? 18 A. Yes. 19 Q. Did you retain an attorney after the 20 end of your employment at Temple? 21 A. Yes. 22 --- 23 (Whereupon, 3/14/14 email 24 string, Bates No. BRIGGS 74-76, was</p>
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<p>1 conversations you had with Sandy reflected 2 in those emails, did you have any other 3 conversations with Sandy before February 4 25th, 2014? 5 A. Yes; in 2012. 6 Q. Right. And we went over an email -- 7 A. Oh, besides that. 8 Q. -- from 2012. 9 A. Oh, okay. Yeah, okay. 10 Q. So my question was: Other than the 11 emails that we've gone over and the meetings 12 that are relayed or contained -- 13 A. Uh-huh. 14 Q. -- in those emails, did you have any 15 other conversations with Sandy Foehl before 16 February 25th, 2014? 17 A. About the case, right? I mean, I -- 18 Q. Any conversations, period. 19 A. -- could have seen her in passing. I 20 don't -- 21 Q. Sure. So did you have any 22 conversations about yourself with Sandy 23 Foehl before February 25th, 2014 other than 24 the communications that we've reviewed and</p>	<p>1 marked as D Exhibit No. 43 for 2 identification.) 3 --- 4 THE COURT REPORTER: 5 Forty-three. 6 BY MS. FENDELL-SATINSKY: 7 Q. Ms. Briggs, have you seen these 8 emails before? 9 A. Yes. 10 Q. And in the top email, it's an email 11 from Deirdre to you dated March 14th, 2014, 12 correct? 13 A. Yes. 14 Q. And she's asking -- you're exchanging 15 questions about poten -- exchanging e-mails 16 about having a meeting. 17 A. Yes. 18 Q. Correct? 19 A. Yes. 20 Q. Was there any meeting that followed 21 these emails? 22 A. I don't know the date that we met. I 23 really don't know. I can look at the email. 24 There was only one where she came to my</p>

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<p style="text-align: right;">Page 445</p> <p>1 office.</p> <p>2 Q. So you only had one in-person meeting</p> <p>3 with Ms. Walton?</p> <p>4 A. Plus if she was there when I was let</p> <p>5 go, but...</p> <p>6 Q. Okay.</p> <p>7 A. Okay.</p> <p>8 Q. So other than the one in-person</p> <p>9 meeting -- other than the time -- other than</p> <p>10 what -- other than the meeting at the end of</p> <p>11 your employment with Temple --</p> <p>12 A. Uh-huh.</p> <p>13 Q. -- did you have any other in-person</p> <p>14 meeting with Ms. Walton?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. And when was that other</p> <p>17 in-person meeting? And you can feel free to</p> <p>18 look back --</p> <p>19 A. Oh, okay.</p> <p>20 Q. -- at the other --</p> <p>21 A. Because I can't remember when I</p> <p>22 thanked her.</p> <p>23 Q. -- exhibits --</p> <p>24 A. All right.</p>	<p style="text-align: right;">Page 447</p> <p>1 Q. Correct?</p> <p>2 A. Correct.</p> <p>3 Q. And have the exhibits refreshed your</p> <p>4 memory about that?</p> <p>5 A. It did.</p> <p>6 Q. Okay. And so when did the in-person</p> <p>7 meeting with Ms. Walton occur?</p> <p>8 A. It happened on April 25th, 2013 at</p> <p>9 11:22.</p> <p>10 Q. What --</p> <p>11 A. Well, actually, that's when I wrote</p> <p>12 the email to her.</p> <p>13 Q. What email --</p> <p>14 A. It happened then.</p> <p>15 Q. What exhibit are you looking at?</p> <p>16 A. It is Exhibit 36. Is that the number</p> <p>17 here?</p> <p>18 THE COURT REPORTER: I think</p> <p>19 it's 30. Oh, no, it's 36, you're</p> <p>20 right.</p> <p>21 THE WITNESS: Uh-huh.</p> <p>22 THE COURT REPORTER: I don't</p> <p>23 have my glasses on.</p> <p>24 THE WITNESS: I do, and I</p>
<p style="text-align: right;">Page 446</p> <p>1 Q. -- if that helps.</p> <p>2 A. Yeah. Oh, it might be here. Sorry.</p> <p>3 Q. So, take a minute to look.</p> <p>4 A. Okay.</p> <p>5 MS. FENDELL-SATINSKY: Let's</p> <p>6 go off the record while you look.</p> <p>7 THE WITNESS: All right.</p> <p>8 MS. FENDELL-SATINSKY: And</p> <p>9 then we can come back on the record.</p> <p>10 THE VIDEOGRAPHER: The time is</p> <p>11 5:53.</p> <p>12 Off the record.</p> <p>13 ---</p> <p>14 (Whereupon, a brief recess was</p> <p>15 taken from 5:53 until 6:01 p.m.)</p> <p>16 ---</p> <p>17 THE VIDEOGRAPHER: 6:01, back</p> <p>18 on the record.</p> <p>19 BY MS. FENDELL-SATINSKY:</p> <p>20 Q. So, Ms. Briggs, before we took a</p> <p>21 break, you were looking through the exhibits</p> <p>22 to help refresh your memory about when you</p> <p>23 had an in-person meeting with Ms. Walton.</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 448</p> <p>1 can't tell.</p> <p>2 BY MS. FENDELL-SATINSKY:</p> <p>3 Q. Okay. So the only in-person meeting</p> <p>4 you had with Ms. Walton was on the Monday</p> <p>5 the week of April 25th; is that correct?</p> <p>6 A. Other than the last day, right?</p> <p>7 Q. Other than your last day.</p> <p>8 A. Yes, uh-huh.</p> <p>9 Q. And that day --</p> <p>10 A. Yes.</p> <p>11 Q. -- would have been April 22nd,</p> <p>12 correct?</p> <p>13 A. April 25th.</p> <p>14 Q. Well, you sent the email on April</p> <p>15 25th, and on April 25th you referred to the</p> <p>16 meeting "this past Monday."</p> <p>17 A. Oh, okay.</p> <p>18 Q. So I'm asking if the past Monday was</p> <p>19 April 22nd.</p> <p>20 A. Yes, it was.</p> <p>21 Q. I believe we already talked about</p> <p>22 your meeting on April 22nd with Ms. Walton.</p> <p>23 Where did that meeting occur?</p> <p>24 A. In my office.</p>

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<p style="text-align: right;">Page 449</p> <p>1 Q. And that was on the tenth floor, 2 right? 3 A. Tenth floor of Conwell. I'm sorry. 4 Carnell. 5 Q. What? 6 A. I said "Conwell." I meant "Carnell." 7 Q. Oh, okay. Is there anything that 8 occurred in that meeting other than what 9 we've already talked about? 10 A. It was very posi -- no. It was very 11 positive. 12 Q. And you felt positive after that 13 meeting, correct? 14 A. Yes, I did. 15 Q. And did Ms. Walton provide you with 16 strategies to use with Dr. Wu and Mr. DiMeo? 17 A. Yes. She listened to me and then 18 talked to me about bidding on other jobs, 19 those kinds. More like advice. 20 Q. Okay. So that -- and just so -- I 21 believe you testified to this earlier, but 22 that's the meeting in which you believe she 23 told you that she would pull back your 24 inability to apply for positions because of</p>	<p style="text-align: right;">Page 451</p> <p>1 Ms. Walton, correct? 2 A. Yes. 3 Q. So if we go back to the first email 4 in this chain, it's a March 23rd email from 5 you to Ms. Walton that starts on BRIGGS 81; 6 is that correct? 7 A. Yes, it is. 8 Q. And Ms. Walton responded to you the 9 next day, correct? 10 A. Yes. 11 Q. And then you responded to Ms. Walton 12 the next day, March 25th, right? 13 A. Yes. 14 Q. And Ms. Walton responded to you then 15 in the final email of this exhibit on the 16 same day, right? 17 A. Yes. 18 --- 19 (Whereupon, 3/28/14 email 20 string, Bates No. EEOC 0067-71, was 21 marked as D Exhibit No. 45 for 22 identification.) 23 --- 24 THE COURT REPORTER:</p>
<p style="text-align: right;">Page 450</p> <p>1 your probation? 2 A. I don't know if that was the time. 3 Q. Okay. 4 A. I don't know. I know there's another 5 email, and I don't see it here. But, but 6 it's probably around that time. 7 Q. Okay. 8 A. But it was a separate email. 9 --- 10 (Whereupon, 3/25/14 email 11 string, Bates No. BRIGGS 79-83, was 12 marked as D Exhibit No. 44 for 13 identification.) 14 --- 15 THE COURT REPORTER: 16 Forty-four. 17 MS. FENDELL-SATINSKY: 18 Forty-four? 19 THE COURT REPORTER: Yup. 20 BY MS. FENDELL-SATINSKY: 21 Q. Ms. Briggs, have you seen this email 22 before? 23 A. Yes, I have. 24 Q. And these are emails between you and</p>	<p style="text-align: right;">Page 452</p> <p>1 Forty-five. 2 BY MS. FENDELL-SATINSKY: 3 Q. Ms. Briggs, you told me earlier that 4 on April 1st you did make a complaint to 5 Sandra Foehl, correct? 6 A. Yes. 7 Q. And what was the content of your 8 complaint to Sandra Foehl on April 1st? 9 A. That I was being discriminated based 10 on my age and my gender, and retaliation. I 11 think I said retaliation. I don't -- I'm 12 not sure. Age and gender. 13 Q. There are notes on this Exhibit D-45, 14 correct? 15 A. There are, yes. 16 Q. And are those your notes? 17 A. That's my handwriting, yes. 18 Q. What did you make those notes? 19 A. April 1st. I don't know exactly 20 when, but... 21 Q. Did you meet make them on April 22 1st -- 23 A. I don't know. 24 Q. -- or?</p>

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<p>1 A. I don't really know. 2 Q. You don't know. 3 You don't know when those notes were 4 made? 5 A. (No response.) 6 Q. Am I correct that you don't know 7 when -- 8 A. And I'm just reading what I wrote. 9 Q. Sure. 10 A. Okay. (Brief pause while reading.) 11 I don't know the answer to the 12 question. 13 Q. Okay. And your notes say that you 14 met with Ms. Foehl at 10:00 a.m. and you 15 were asked to meet with Mr. Wacker at 10:30 16 a.m.? 17 A. Correct. 18 Q. Earlier, you testified that Mr. 19 Wacker called you first thing in the morning 20 and asked to meet with you. You said that 21 you had a meeting and that you would let him 22 know when you were back. 23 A. Yes. 24 Q. So Mr. Wacker did not ask to meet</p>	<p>1 10:30, correct? 2 A. He asked me to meet at 10:00. 3 --- 4 (Whereupon, 4/21/14 email 5 string, Bates No. TEMPLE0174-175, 6 was marked as D Exhibit No. 46 for 7 identification.) 8 --- 9 THE COURT REPORTER: 10 Forty-six. 11 BY MS. FENDELL-SATINSKY: 12 Q. Ms. Briggs, have you seen this 13 document before? 14 A. Yes, I have. 15 Q. If you turn to the last page of this 16 document, this is an April 2nd email from 17 Ms. Foehl to you. 18 Do you see that? 19 A. Yes, I do. 20 Q. And she says, "Ruth, I appreciate 21 that you are able to send me correspondence 22 you referenced in our meeting yesterday. I 23 will conduct an investigation of your 24 complaint of age discrimination."</p>
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<p>1 with you at 10:30, did he? 2 A. When I called him, he asked me to 3 come at 10:30. 4 Q. So you called him when you returned, 5 and he said to come. And that was at 10:30? 6 A. No, that's not, not how it happened. 7 Q. Okay. So what happened? 8 A. He called me first thing in the 9 morning -- 10 Q. Right. 11 A. -- when I got there and said that 12 there was a dean's office meeting. And I 13 said, "Well, I can't come at that time, but 14 I can be there at 10:30." 15 And he said that would be fine. So I 16 went right from Sandy's office to his 17 office. 18 Q. So he did not ask you to meet at 19 10:30, correct? 20 A. (No response.) 21 Q. You offered to meet at 10:30. 22 A. Well, I said I could meet with him at 23 10:30, right. 24 Q. So he did not ask you to meet at</p>	<p>1 Do you see that? 2 A. Yes, I do. 3 Q. And in your response to her, you did 4 not indicate that she should also be 5 investigating a complaint of gender 6 discrimination or retaliation, correct? 7 A. I don't... 8 Q. So Ms. Foehl told you on April 2nd 9 that she was going to conduct an 10 investigation of your complaint of age 11 discrimination. 12 A. Yes. 13 Q. Correct? 14 A. Yes. 15 Q. Her email does not mention gender 16 discrimination or retaliation, correct? 17 A. It doesn't mention that. 18 Q. And you responded to Ms. Foehl, 19 correct? 20 A. Yes. 21 Q. And your response does not say 22 anything about the fact that you'd like her 23 to investigate gender discrimination or 24 retaliation, correct?</p>

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<p>1 A. No, it doesn't.</p> <p>2 Q. Are you certain that you told</p> <p>3 Ms. Foehl that you felt you were being</p> <p>4 discriminated against because of your gender</p> <p>5 and retaliation?</p> <p>6 A. Yes, I am.</p> <p>7 Q. So if Ms. Foehl said that you only</p> <p>8 made a complaint about age discrimination,</p> <p>9 would she be lying?</p> <p>10 MR. MUNSHI: Just objection to</p> <p>11 form.</p> <p>12 You can answer.</p> <p>13 THE WITNESS: I'm sorry?</p> <p>14 MR. MUNSHI: Objection to</p> <p>15 form, but you can answer the</p> <p>16 question.</p> <p>17 THE WITNESS: Okay. I</p> <p>18 believed it was both.</p> <p>19 MS. FENDELL-SATINSKY: That</p> <p>20 wasn't my question.</p> <p>21 THE WITNESS: Yes, I, I</p> <p>22 mentioned gender and age.</p> <p>23 MS. FENDELL-SATINSKY: Okay.</p> <p>24</p>	<p>1 from Ms. Foehl that said, "I will conduct an</p> <p>2 investigation of your complaint of age</p> <p>3 discrimination" --</p> <p>4 A. Yes.</p> <p>5 Q. -- did you understand that to mean</p> <p>6 that she did not understand that you had</p> <p>7 also made a complaint or --</p> <p>8 A. If I can be really perfectly</p> <p>9 honest --</p> <p>10 Q. Sure.</p> <p>11 A. -- with you, I didn't pick that up.</p> <p>12 Q. Okay.</p> <p>13 A. It was a bad, bad couple days.</p> <p>14 Q. Other than what we've gone through,</p> <p>15 the emails that we've talked about and the</p> <p>16 other meetings that we've talked about and</p> <p>17 the meetings that are conveyed in these</p> <p>18 emails, did you make any other complaints to</p> <p>19 anyone in management, H.R., or Legal at</p> <p>20 Temple about what you viewed as</p> <p>21 discrimination, retaliation, or harassment?</p> <p>22 A. No.</p> <p>23 Q. And I know you told me earlier that</p> <p>24 you never told Dr. Wu that you felt he was</p>
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<p>1 BY MS. FENDELL-SATINSKY:</p> <p>2 Q. So my question was that: If Ms.</p> <p>3 Foehl said that you only complained about</p> <p>4 age discrimination, would she be lying?</p> <p>5 A. I would not say she was lying.</p> <p>6 Q. So there may have been a</p> <p>7 misunderstanding?</p> <p>8 A. Yes. I don't think of her as a</p> <p>9 person who would lie.</p> <p>10 Q. So you believe, you believe that you</p> <p>11 conveyed to Ms. Foehl that you wanted to</p> <p>12 make a complaint of age and gender</p> <p>13 discrimination and maybe retaliation,</p> <p>14 correct?</p> <p>15 A. Yes.</p> <p>16 Q. And you believe it's possible,</p> <p>17 however, that Ms. Foehl did not understand</p> <p>18 that; is that correct?</p> <p>19 A. Yes.</p> <p>20 MR. MUNSHI: Just objection to</p> <p>21 form.</p> <p>22 THE WITNESS: Yes.</p> <p>23 BY MS. FENDELL-SATINSKY:</p> <p>24 Q. When you got the email on April 2nd</p>	<p>1 treating you differently because of your</p> <p>2 sex, correct?</p> <p>3 A. I don't recall that I did. No, I</p> <p>4 don't.</p> <p>5 Q. Did you ever tell Mr. Wacker that you</p> <p>6 believed you were being discriminated</p> <p>7 against because of your sex?</p> <p>8 A. I believe I did.</p> <p>9 Q. You did or you believe you did?</p> <p>10 A. I remem -- that's what I remember.</p> <p>11 Q. So --</p> <p>12 A. At the same time, the same time I</p> <p>13 talked about the age thing.</p> <p>14 Q. The same time you talked to</p> <p>15 Mr. Wacker about the age thing? You had not</p> <p>16 previously told me that you had relayed</p> <p>17 anything to Mr. Wacker --</p> <p>18 A. Yeah. Because I was --</p> <p>19 Q. -- about an --</p> <p>20 A. -- written up.</p> <p>21 Q. -- age thing.</p> <p>22 A. I don't, I don't --</p> <p>23 Q. Are you referring to your write-up</p> <p>24 from 2011?</p>

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<p>1 A. No.</p> <p>2 Q. Okay. Which write-up are you</p> <p>3 referring to?</p> <p>4 A. It was --</p> <p>5 Q. You told me earlier that the write-up</p> <p>6 you received in January 2011 --</p> <p>7 A. Right.</p> <p>8 Q. -- was after Dr. Wu made a comment to</p> <p>9 you about women being put out to pasture at</p> <p>10 a certain age in China, correct?</p> <p>11 A. Yes.</p> <p>12 MR. MUNSHI: Just objection to</p> <p>13 form on the date. It wasn't January</p> <p>14 2011.</p> <p>15 MS. FENDELL-SATINSKY: I think</p> <p>16 it was November 2011.</p> <p>17 MR. MUNSHI: Yeah.</p> <p>18 BY MS. FENDELL-SATINSKY:</p> <p>19 Q. So the November 2011 discipline that</p> <p>20 you received you believed was a result of</p> <p>21 you telling Dr. Wu -- let me step back.</p> <p>22 Are you saying that you spoke with</p> <p>23 Mr. Wacker about the discipline you received</p> <p>24 in November 2011?</p>	<p>1 testified, whether he knew what Dr. Wu had</p> <p>2 said to you.</p> <p>3 A. Correct.</p> <p>4 Q. Correct?</p> <p>5 A. Yes.</p> <p>6 Q. Other than saying that, did you say</p> <p>7 anything else? Did you say anything to</p> <p>8 Dr. -- I did it again.</p> <p>9 A. Greg.</p> <p>10 Q. Other than that, did you say anything</p> <p>11 else to Mr. Wacker --</p> <p>12 A. I did.</p> <p>13 Q. -- about -- let me finish my</p> <p>14 question.</p> <p>15 A. I'm sorry.</p> <p>16 Q. Other than that, did you say anything</p> <p>17 else to Mr. Wacker about age discrimination?</p> <p>18 A. About age or gender?</p> <p>19 Q. My question was about age.</p> <p>20 A. Yes, I did.</p> <p>21 Q. What did you say to him?</p> <p>22 A. I told him what Dr. Wu had told me,</p> <p>23 that about the statement in China women are</p> <p>24 put out to pasture at 55.</p>
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<p>1 A. No. I think, I think -- the one</p> <p>2 about where I was written up for</p> <p>3 insubordination or unprofessional conduct?</p> <p>4 Q. So, there are a few disciplines. So</p> <p>5 there is a discipline from 2011 that --</p> <p>6 A. Yes.</p> <p>7 Q. -- from November of 2011 that you</p> <p>8 testified occurred after Dr. Wu made a</p> <p>9 comment to you --</p> <p>10 A. Okay.</p> <p>11 Q. -- that women were put out to pasture</p> <p>12 at a certain age --</p> <p>13 A. Right.</p> <p>14 Q. -- in China, correct?</p> <p>15 A. That is correct.</p> <p>16 Q. And you told me that you went to</p> <p>17 Dr. -- you went to Mr. Wacker about that</p> <p>18 discipline, right?</p> <p>19 A. I was called to him by him.</p> <p>20 Q. By him.</p> <p>21 And he gave you the discipline; is</p> <p>22 that right?</p> <p>23 A. Yes, he did.</p> <p>24 Q. And you asked Mr. Wacker, you</p>	<p>1 Q. Right. Other than that, did you say</p> <p>2 anything else to him about being treated</p> <p>3 differently because of your age?</p> <p>4 A. I can't say specifically what it was.</p> <p>5 We had a long conversation. I don't</p> <p>6 remember. It was all about that. I can't</p> <p>7 say.</p> <p>8 Q. Is there anything you can do to</p> <p>9 refresh your recollection?</p> <p>10 A. No, I -- uhm, right now, I can't.</p> <p>11 Q. So there's nothing sitting here today</p> <p>12 that you can do to refresh your recollection</p> <p>13 about what else you may have said to</p> <p>14 Dr. Wacker -- I did it again.</p> <p>15 There is nothing else sitting here</p> <p>16 today that you can do to refresh your</p> <p>17 recollection about what you said to</p> <p>18 Mr. Wacker in the meeting in which you</p> <p>19 received discipline in November of 2011,</p> <p>20 correct?</p> <p>21 A. Not -- correct, not that I recall.</p> <p>22 Q. And you can't do anything to refresh</p> <p>23 your recollection sitting here today,</p> <p>24 correct?</p>

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<p>1 A. No. The -- no.</p> <p>2 Q. And when you relayed to Dr. Wacker</p> <p>3 the comments that Dr. Wu made to you, did</p> <p>4 you say anything else about the comment</p> <p>5 other than relaying the comment to him?</p> <p>6 A. It is my recollection that we talked</p> <p>7 about the gender, the age, and the</p> <p>8 retaliation.</p> <p>9 Q. But you don't remember anything</p> <p>10 specific about that conversation then what</p> <p>11 else you said to him, correct?</p> <p>12 A. No, I don't.</p> <p>13 Q. You don't remember anything else.</p> <p>14 A. I don't recall, no.</p> <p>15 Q. Correct?</p> <p>16 A. That's correct, yes.</p> <p>17 Q. And you don't remember anything else</p> <p>18 that Mr. Wacker said to you in that</p> <p>19 conversation, correct?</p> <p>20 A. No, I don't.</p> <p>21 Q. So it's just -- is it your guess that</p> <p>22 you said something else to him about your</p> <p>23 age, your gender, and retaliation, or do you</p> <p>24 remember saying something to him about</p>	<p>1 Q. Do you remember saying anything to</p> <p>2 doc -- to Mr. Wacker in that conversation</p> <p>3 about retaliation?</p> <p>4 A. I can't say for sure, no.</p> <p>5 Q. And there's nothing sitting here</p> <p>6 today that you can do to refresh your</p> <p>7 recollection?</p> <p>8 A. No. I have no records from that</p> <p>9 time.</p> <p>10 Q. Other than that one conversation you</p> <p>11 had with Mr. Wacker in which you relayed a</p> <p>12 conversation in which -- I'm sorry. Let me</p> <p>13 start again.</p> <p>14 Other than that one conversation you</p> <p>15 had with Mr. Wacker where you relayed</p> <p>16 Dr. Wu's comment --</p> <p>17 A. Yeah.</p> <p>18 Q. -- did you have any other</p> <p>19 conversations with Mr. Wacker about being</p> <p>20 treated differently because of your age or</p> <p>21 gender?</p> <p>22 A. Not directly.</p> <p>23 Q. What do you mean "not directly"?</p> <p>24 A. I spoke to Drew.</p>
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<p>1 your -- let's start with your age.</p> <p>2 Do you remember saying something else</p> <p>3 to him about your age?</p> <p>4 A. My age, yes.</p> <p>5 Q. Okay. So what else did you say to</p> <p>6 him about your age?</p> <p>7 A. Oh, what else besides the -- no,</p> <p>8 nothing.</p> <p>9 Q. Okay.</p> <p>10 A. I thought -- okay.</p> <p>11 Q. Do you remember saying anything else</p> <p>12 to Mr. Wacker in that conversation or -- let</p> <p>13 me ask the question again.</p> <p>14 Do you remember saying anything to</p> <p>15 Dr. Wacker -- there we go.</p> <p>16 Do you remember saying anything to</p> <p>17 Greg in that conversation about your gender?</p> <p>18 A. I don't remember exactly.</p> <p>19 Q. And there is nothing sitting here</p> <p>20 today that you can do to refresh your</p> <p>21 recollection, right?</p> <p>22 A. No.</p> <p>23 Q. Nothing you can do, correct?</p> <p>24 A. Nothing I can do.</p>	<p>1 Q. But not to Dr. Wacker?</p> <p>2 A. Mister. No.</p> <p>3 Q. Mr. Wacker.</p> <p>4 A. Okay. Uhm, no.</p> <p>5 Q. Okay.</p> <p>6 A. Drew was like my contact.</p> <p>7 Q. So just so the record is clean, other</p> <p>8 than that one conversation with Mr. Wacker</p> <p>9 during which you relayed a comment Dr. Wu</p> <p>10 made to you, you did not have any other</p> <p>11 conversations with Mr. Wacker himself about</p> <p>12 treating -- being treated differently</p> <p>13 because of your age or gender, correct?</p> <p>14 A. That's correct.</p> <p>15 Q. And you did not have any other</p> <p>16 conversations with Mr. Wacker where you</p> <p>17 spoke to him about retaliation, correct?</p> <p>18 A. Correct.</p> <p>19 Q. You said you spoke with Drew about</p> <p>20 age and gender discrimination; is that</p> <p>21 accurate?</p> <p>22 A. That is accurate.</p> <p>23 Q. Okay. When did you do that?</p> <p>24 A. It was in 2014. Uhm, I don't have a</p>

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<p>1 date.</p> <p>2 Q. What did you tell him?</p> <p>3 A. I told him that I believed that I was</p> <p>4 being treated differently than other people</p> <p>5 in the department because of my age and</p> <p>6 because of my gender, and he was angry at me</p> <p>7 for saying it.</p> <p>8 Q. What did he say to you?</p> <p>9 A. He said, "I don't know where that" --</p> <p>10 you know, I can't remember exactly, but it</p> <p>11 was very -- it wasn't a very good meeting,</p> <p>12 so...</p> <p>13 Q. Okay. So, I don't want you to guess</p> <p>14 what happened at the meeting. I want you to</p> <p>15 only tell me what you remember happening at</p> <p>16 the meeting.</p> <p>17 So what do you remember Mr. DiMeo</p> <p>18 saying in response to your comment that you</p> <p>19 thought you were treated differently because</p> <p>20 of your age and gender?</p> <p>21 A. I, I, I can't recall specifics. I'm</p> <p>22 sorry.</p> <p>23 Q. Do you remember anything else about</p> <p>24 your conversation with Drew in which you</p>	<p>1 He was like, you know, "Just listen to him."</p> <p>2 And I don't -- I don't recall the exact</p> <p>3 word. I was a wreck.</p> <p>4 Q. So are you positive that you told him</p> <p>5 during that meeting that you were treated</p> <p>6 differently because of your age and gender,</p> <p>7 or are you -- or did you believe he inferred</p> <p>8 that based on your -- what you said?</p> <p>9 A. I know I told him. I know I told</p> <p>10 him. I don't recall exactly when.</p> <p>11 Q. Well, you told me it was in 2014.</p> <p>12 A. It was in 2014. That's when</p> <p>13 things -- I knew something was coming. I</p> <p>14 could feel it.</p> <p>15 Q. So was it toward the end of your time</p> <p>16 at Temple?</p> <p>17 A. I actually think I have an email.</p> <p>18 And I can look for it, but I think it was</p> <p>19 probably in February.</p> <p>20 Q. And you believe you have an email</p> <p>21 that says what?</p> <p>22 A. About -- well, actually, it wouldn't</p> <p>23 say that. About going to his -- I don't</p> <p>24 know what day it was I went to his office.</p>
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<p>1 told him you thought you were treated</p> <p>2 differently because of your age and your</p> <p>3 gender?</p> <p>4 A. I thought I just answered the</p> <p>5 question. No.</p> <p>6 Q. Do you remember where the</p> <p>7 conversation --</p> <p>8 A. It was --</p> <p>9 Q. -- occurred?</p> <p>10 A. It was in his office.</p> <p>11 Q. Did you go to him to specifically</p> <p>12 speak about this, or were you there to</p> <p>13 discuss something else?</p> <p>14 A. I was called. I believe I was called</p> <p>15 into his office for some -- to be proactive,</p> <p>16 but I don't, I don't -- it was after our</p> <p>17 meeting. It was after a meeting with Dr.</p> <p>18 Wu, and he wanted me to come back. I don't</p> <p>19 know if his intent was to go over something</p> <p>20 else with me, but...</p> <p>21 Q. But you raised this with him; he</p> <p>22 didn't raise this with you, correct?</p> <p>23 A. At -- after I met with Dr. Wu and he</p> <p>24 asked me to go back. And he was mad at me.</p>	<p>1 So I have a "come to my office" kind of</p> <p>2 thing.</p> <p>3 Q. Well, you said that this</p> <p>4 conversation --</p> <p>5 A. Yeah.</p> <p>6 Q. -- occurred when you went to his</p> <p>7 office.</p> <p>8 A. His office, right. "Come to my</p> <p>9 office."</p> <p>10 Q. Right.</p> <p>11 A. His office.</p> <p>12 Q. So you said you have -- you think you</p> <p>13 have an email that --</p> <p>14 A. That said, "Come to my office."</p> <p>15 Q. -- reflects this.</p> <p>16 A. But you're right, I don't have</p> <p>17 anything that says anything. I did talk to</p> <p>18 him privately about it. I didn't put it in</p> <p>19 writing.</p> <p>20 Q. And you don't have -- the email that</p> <p>21 you think you have from him just says "come</p> <p>22 to my office" or words to that effect?</p> <p>23 A. Some -- yeah.</p> <p>24 Q. And, again, just for the record, we</p>

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